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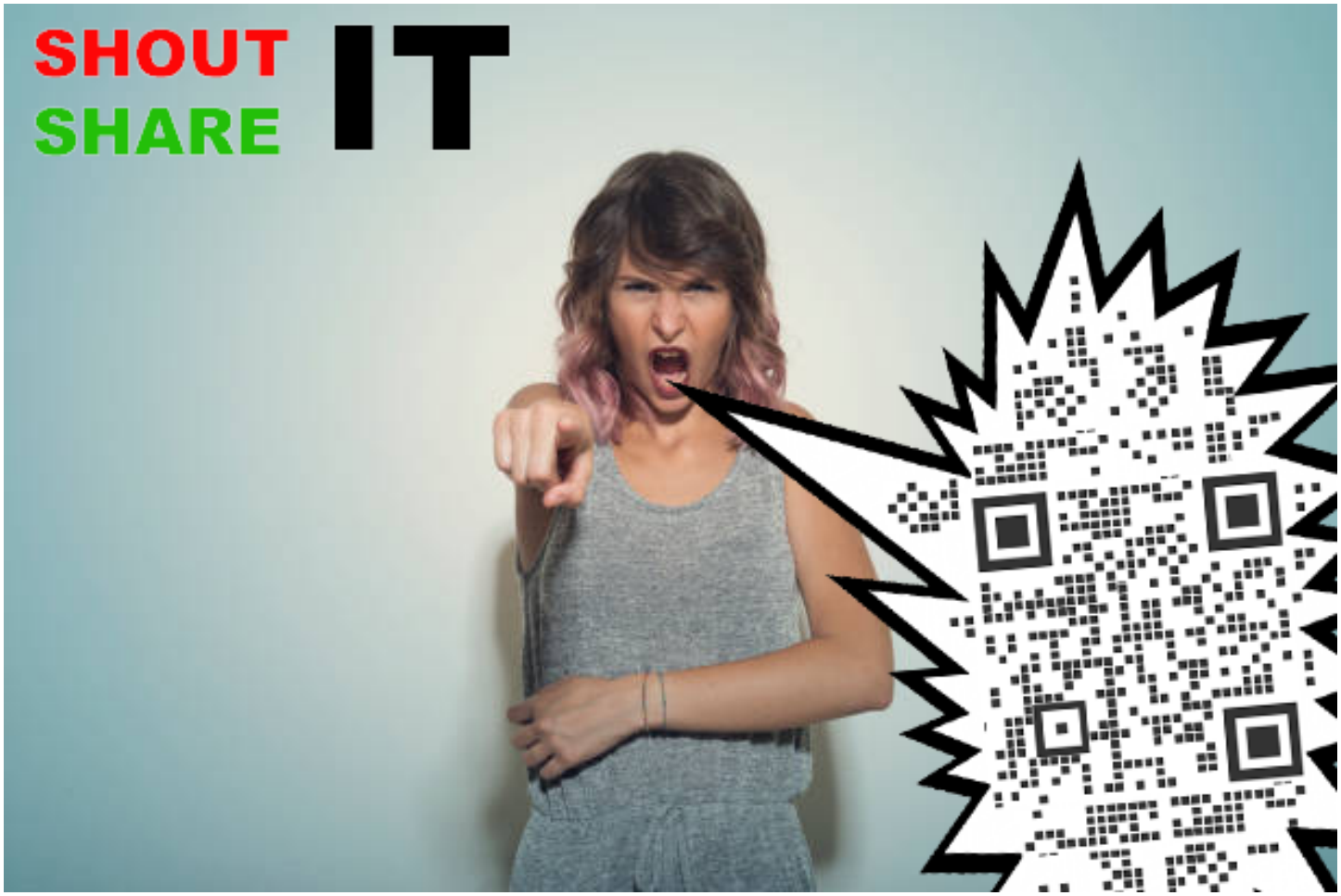
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United States
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Tongass
National
Forest

R10-MB-349b

January 1998

Control Lake Timber Sales

Supplemental Draft Environmental Impact Statement

Volume II— Appendices A, B, C, D, E

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Contract No. 53-0109-3-00369
Control Lake Environmental Impact Statement

Appendix A

Reasons for Scheduling the Environmental Analysis of the Control Lake Project Area

Reasons For Scheduling The Environmental Analysis Of The Control Lake Project Area

Summary

Reasons for scheduling the Control Lake Project Area at this time may be summarized as follows:

1. The Control Lake Project Area contains a sufficient number of acres allocated to development land use designations (LUDs) to make timber harvest in the area appropriate under the Tongass Land Management Plan (TLMP). Available information indicates harvest of the amount of timber being considered for this project can occur consistent with TLMP standards and guidelines and other requirements for resource protection.

2 Areas with available timber will be necessary to consider for harvest in order to seek to provide a supply of timber from the Tongass National Forest which (1) meets the annual market demand for timber from such forest and (2) meets the market demand from such forest for each planning cycle, pursuant to Section 101 of the Tongass Timber Reform Act (TTRA).

3 Effects on subsistence resources are projected to differ little according to which sequence these areas are subjected to harvest. Harvesting other areas with available timber on the Tongass National Forest is expected to have similar potential effects on resources, including those used for subsistence, because of widespread distribution of subsistence use and other factors. Harvest of these other areas is foreseeable, in any case, over the forest planning horizon under the TLMP.

4. Providing substantially less timber volume than required to meet TLMP and TTRA Section 101 timber supply and employment objectives in order to avoid harvest in the Control Lake Project Area is not necessary or reasonable.

5. It is reasonable to schedule harvest in the Control Lake Project Area at the present time rather than other areas in terms of previous harvest entry and access, level of controversy over subsistence and other effects, and the ability to complete the National Environmental Policy Act (NEPA) process and make timber available to meet the needs of dependent industries. Other areas that are reasonable to consider for harvest in the near future are the subject of other project EISs that are currently ongoing or scheduled to begin soon.

More detail regarding the scheduling of the environmental analysis for the Control Lake Project Area is presented in this appendix in three subsections:

Southeast Alaska Timber Demand
Tongass Land Management Plan
Forest Plan Implementation

Southeast Alaska Timber Demand

Introduction.

In general, this section indicates that areas with available timber will be necessary to consider for harvest in order to seek to provide a supply of timber from the Tongass National Forest which (1) meets the

annual market demand for timber from such forest and (2) meets the market demand from such forest for each planning cycle, pursuant to Section 101 of the Tongass Timber Reform Act.

Meeting Market Demand.

Timber demand in Southeast Alaska can vary dramatically from year to year. The level of demand is dependent on complex interactions among factors that are difficult, if not impossible, for the industry or the Forest Service to predict with accuracy. Such factors include fluctuations in interest rates, housing starts, business cycles in the United States and overseas, changes in the value of the dollar with respect to foreign currencies, changes in import tariffs, and changes in export policies in other countries.

To be responsive to market demand, the Forest Service attempts to provide an opportunity for the industry as a whole to accumulate a supply of purchased but unharvested timber (i.e. volume under contract) equal to about three years of timber consumption. There are a number of reasons for allowing the accumulation of volume under contract. First, this allows the industry ample time to plan an orderly and systematic harvest schedule that meets all timing restrictions and permit requirements. Second, it allows the industry to better manage its financial resources and to secure financing on the basis of longer term timber supply. Third, it allows time for the necessary infrastructure (roads, log transfer facilities, and logging camps) to be put in place prior to timber harvest. Finally, an ample timber supply gives the industry more opportunity to sustain itself through market cycles. If demand for pulp or lumber in any year suddenly increases, producers will have access to enough timber to respond to the increase in demand without waiting for the Forest Service or the Congress to take action. Normally, the unharvested volume under contract will be drawn down during high points in the market when mills increase production, and built up when markets are poor and production declines. In response to changes observed in the volume under contract the Forest Service may consider adjusting its budget and timber program.

From the initiation of a timber sale project, through EIS and decision document preparation, and to the sale of timber from the project usually requires three to four years. Such lengthy preparation time means that in order to have a stable timber supply and be able to respond to upswings in the market, there is a need to have ongoing NEPA projects. It is also necessary to have a supply of NEPA cleared volume available for sale if an increased market demand is to be met.

The timber industry in southeast Alaska is now in a period of transition. Following the closings of the APC and KPC pulp mills, new mills are either under construction or are being proposed, and existing mills are being upgraded. There is currently a proposal for a veneer plant at Ward Cove. This mill would use utility grade logs. The veneer could be sent to other mills for manufacture into plywood or laminated veneer lumber, or a revamped facility at the former KPC pulp mill site could manufacture the veneer into secondary products. According to Richard Leary, acting president and general manager of Ketchikan Pulp Company, the plant size would depend on the developers' degree of comfort with timber harvest levels, and a stable harvest level from the Tongass National Forest is an important factor. A decision on whether to go ahead with this venture is expected by mid November, 1997 (Daily Sitka Sentinel 8/15/97). A new Seley Log and Lumber Company mill is currently under construction on Gravina Island, in the Ketchikan area. The facility will employ 60 people if run at full capacity, and will house both a sawmill and secondary and tertiary manufacturing mills. Product outputs will include decking and fencing, and possibly furniture. The owner plans to begin operation in November of this year (Ketchikan Daily News 8/21/97). As for existing southeast Alaska mills, the Viking Lumber sawmill in Klawock, on Prince of Wales Island, recently underwent a modernizing upgrade and re-tooling; computerized equipment and a whole-log chipper were added (USDA Forest Service 1996). Also, the APC sawmill in Wrangell, according to numerous media reports, may be purchased and reopened in the near future. All of these mills will depend to some extent on a supply of timber from the Tongass National Forest.

The market demand analysis in the 1997 TLMP was based on a study by David Brooks and Richard Haynes, research scientists at the Pacific Northwest Research Station. Following the release of TLMP a final version of the Brooks and Haynes report was published, and it is this final report that is referenced

and cited throughout this appendix. Three scenarios were developed in the study to display the demand for Tongass National Forest timber through the year 2010 (Brooks and Haynes 1997). For the low scenario, high stumpage, harvest and manufacturing costs limit Alaska's share of markets. Under the high scenario, increased harvest and manufacturing efficiency, with resulting lower costs, make Alaskan mills more competitive. Projected annual timber demand for the next decade is 113 MMBF for the low scenario, 133 MMBF for the medium and 156 MMBF for the high scenario. These three scenarios do not consider the Seley mill that is under construction on Gravina Island, the proposed KPC veneer plant, or the possible sale and reopening of the APC sawmill in Wrangell. Nor do they account for shifting markets in Japan and the newfound willingness of the Japanese to purchase Alaskan milled lumber, manufactured wood products, laminates, etc. All of these factors would lead to an increase in demand over the totals listed for the three scenarios. The actual ASQ for the Tongass averages 267 MMBF on an annual basis, however a level of 200 MMBF or less is more likely to be offered over the next few years, given current market conditions and the transition that both the timber industry and the Forest Service are experiencing (USDA Forest Service 1997).

Tongass Land Management Plan

Chapter 1 of this EIS includes an explanation of how this project relates to the Tongass Land Management Plan. That section describes the Land Use Designations (LUDs) which put land areas under different types of management prescriptions. Chapter 1 also explains that the Forest is divided into land areas called value comparison units (VCUs). In most cases, VCUs are roughly equivalent to large watersheds. A VCU may contain one or more LUDs.

The allowable sale quantity (ASQ) calculated in the TLMP is an upper limit, by decade, on the volume of timber that may be offered for sale from suitable timberland on the Forest as part of the regularly scheduled timber sale program. The current ASQ is 2.67 billion board feet per decade, which equates to an annual average of 267 million board feet. There are 676,000 acres suitable for timber management under the Forest Plan. Three LUDs (Timber Production, Modified Landscape, and Scenic Viewshed) account for nearly all of these suitable acres (USDA Forest Service 1997).

1. Cumulative Effects

The TLMP considers the cumulative effects for forest-wide acres managed for timber production for both the long-term and short-term timber sale programs. These effects are discussed at the end of their respective sections.

Analysis points to the need to schedule harvest in VCUs assigned management prescriptions which permit consideration of timber harvest, including the VCUs within the Control Lake Project Area. These VCUs in the Forest plan would be needed to help meet TLMP and TTRA timber supply objectives. The forest-wide cumulative effects analysis in the TLMP supports the conclusion that this harvest can be accomplished within existing standards and guidelines and other requirements for resource protection.

2. Subsistence

With the passage of the Alaska National Interest Lands Conservation Act (ANILCA), Congress recognized the importance of subsistence resources to rural residents of Alaska. In particular, prior to any disposition of public lands, an agency must first complete a subsistence effects evaluation, including consideration of the availability of other lands (ANILCA 810 (a)).

Based on a review of available harvest volumes for each value comparison unit (VCU) on the Ketchikan Area of the Tongass National Forest, it appeared that in order to meet market demand, most of the Timber Production land use designations would need some level of harvest in the first decade of the 1997 Tongass Land Management Plan. A tentative sale schedule was developed, and will be updated every six months based on this analysis (Ketchikan Area Sale Schedule Summary, March 1997). In short, harvesting at this level to meet market demand, would indicate a level of impact to all subsistence use areas. However, the most significant impacts on subsistence deer habitat would not occur until 20 to 30 years after timber harvest when the second growth canopy closes. When those impacts to subsistence deer habitat are viewed from a reference point 20 years in the future, the particular importance of which areas are scheduled first during a 5-year period appears to be minor.

In considering rural communities that may be most affected by any proposed timber harvest in the Control Lake Project Area, Coffman Cove, Craig, Hollis, Hydaburg, Klawock and Thorne Bay appear to have the strongest cultural and subsistence ties to the area. Each community has its own level of reliance on subsistence, as well as its own level of reliance on the Control Lake Project Area for supplying subsistence resources, especially deer. The following information about each community's subsistence

use is a summary of more detailed information provided in Chapter 3 and 4 of the Control Lake Project EIS and the project files.

Coffman Cove Areas adjacent to the road system and in the immediate vicinity of Coffman Cove are some of the major subsistence use areas for the community. Thirty-seven percent of Coffman Cove's deer harvest came from the Project Area WAA's between 1988 and 1991. There is a significant possibility of a significant restriction of the subsistence use of deer by Coffman Cove residents, if non-rural harvesting is not restricted, for all alternatives.

Craig Areas adjacent to the road system and those accessed by boat in the southwest portion of the Project Area are some of the major subsistence use areas within the Project Area. Approximately fifty percent of Craig's deer came from the Project Area WAAs between 1987 and 1990. There is a significant possibility of a significant restriction of the subsistence use of deer by Craig residents, if non-rural harvesting is not restricted, for all alternatives.

Hollis Fourteen percent of Hollis' deer came from the Project Area WAAs between 1987 and 1990. Analysis shows that there is an adequate number of deer to meet the current subsistence demand for deer now, however, it may be necessary to restrict the sport harvest of deer in the future.

Hydaburg Eighteen percent of Hydaburg's deer came from the Project Area WAAs between 1987 and 1990. Analysis shows that there is an adequate number of deer now, however, it may be necessary to restrict the sport harvest of deer in the future.

Klawock Subsistence harvest methods within the community of Klawock have been changing since the road tie with Hollis was made in 1984. Prior to that time subsistence harvest was mostly tied to boating activities. The community places high importance on the southwest portion of the Project Area for traditional and cultural subsistence values. Sixty-six percent of Klawock's deer came from the Project Area WAAs between 1987 and 1990. There is a significant possibility of a significant restriction of the subsistence use of deer by Klawock residents, if non-rural harvesting is not restricted, for all alternatives.

Thorne Bay Fifty percent of Thorne Bay's deer came from the Project Area WAAs between 1988 and 1991. There is a significant possibility of a significant restriction of the subsistence use of deer by Thorne Bay residents, if non-rural harvesting is not restricted, for all alternatives.

As a result of several considerations, including the availability of subsistence resources in non-development land use designations on Prince of Wales Island (such as the Honker and Rio Roberts OGRs, the Semi-remote Recreation LUD in the southwest part of the project area and the Karta Wilderness adjacent to the Project Area), standards and guidelines designed to maintain habitat (such as the 1,000-foot beach and estuary fringes), the relative independence of most communities from subsistence resources in the Project Area, as well as analysis contained in the 1997 Tongass Land Management Plan EIS and earlier analyses, the Forest Service determined to schedule an environmental analysis of the Control Lake area. Other projects including Central Prince of Wales, Polk Inlet, Lab Bay, Sea Otter Sound, Staney, Luck, North Thorne, and others, are being implemented, or will undergo environmental analysis within the next 3 to 5 years.

Extensive forest-wide cumulative effect analysis has been included in the 1997 TLMP EIS (TLMP EIS, Part 2, pages 3-529 through 3-685). That analysis, and the tables of data with the maps in Appendix H of the 1997 TLMP EIS are incorporated by reference into this document. The data in Appendix H indicates subsistence hunting of deer and other uses in virtually every area of the Tongass National Forest that have substantial quantities of harvestable timber. The following community information is extracted directly out of the 1997 Tongass Land Management Plan EIS:

> All [TLMP] alternatives should be able to provide habitat capability for deer hunted by Coffman Cove residents. In the long term, projected deer harvest for all rural hunters and all hunters

exceed 10 percent of capability. At some point, a restriction in hunting may be necessary. (1997 TLMP, Part 2, page 3-536).

All [TLMP] alternatives should be able to provide habitat capability for deer hunted by Craig residents. In the long term, projected deer harvest for all rural hunters and all hunters exceed 10 percent of capability. At some point, a restriction in hunting may be necessary. (1997 TLMP, Part 2, page 3-542).

All [TLMP] alternatives should be able to provide habitat capability for deer hunted by Hollis residents, all rural hunters and all hunters in the short term. However, in the long term, the projected deer harvest for all hunters exceeds 10 percent of habitat capability and all [TLMP] alternatives may have future inadequate habitat capability for the total deer hunted. At some point, a restriction in hunting may be necessary (1997 TLMP, Part 2, page 3-563).

All [TLMP] alternatives should be able to provide habitat capability for deer hunted by Hydaburg residents, all rural hunters and all hunters in the short term. However, in the long term, the projected deer harvest for all hunters exceeds 10 percent of habitat capability and all [TLMP] alternatives may have future inadequate habitat capability for the total deer hunted. At some point, a restriction in hunting may be necessary (1997 TLMP, Part 2, page 3-573).

All [TLMP] alternatives should be able to provide habitat capability for deer hunted by Klawock residents. In the long term, projected deer harvest for all rural hunters and all hunters exceed 10 percent of capability. At some point, a restriction in hunting may be necessary. (1997 TLMP, Part 2, page 3-601).

All [TLMP] alternatives should be able to provide habitat capability for deer hunted by Thorne Bay residents. In the long term, projected deer harvest for all rural hunters and all hunters exceed 10 percent of capability. At some point, a restriction in hunting may be necessary. (1997 TLMP, Part 2, page 3-664).

The analysis shown in Chapter 4 of this Project EIS is supported by the analysis shown above in the 1997 TLMP EIS. The conclusion stated above, "At some point, a restriction in hunting may be necessary.", supports the conclusion that any environmental analysis area within the northern portion of Prince of Wales area would have a similar chance of having a significant possibility of a significant restriction on subsistence resources for Sitka black-tailed deer. It should also be noted that significant restrictions on the black bear and furbearer subsistence resources currently exist on all or portions of the same area.

The analyses for ANILCA section 810 are shown in the Subsistence section of Chapter 4, in this EIS. The determinations made from the ANILCA section 810 analysis and findings will be a part of the Record of Decision for this project.

Forest Plan Implementation

Review of Available Volume

A review was conducted of each VCU for available volume. This analysis was based on computer inventories and Allowable Sale Quantity (ASQ) calculations used for the TLMP. All areas available for timber harvest under the 1997 TLMP can be expected to be entered for harvest sometime in the future if the plan is to be fully implemented. This analysis represents one scenario for meeting the average annual ASQ of 267 MMBF. Obviously, there can be other scenarios which harvest either more or fewer acres in the Project Area and still meet the ASQ. Harvest projections from this analyis for the Control Lake Project Area are shown in Table 1.

Table 2 displays the Tongass National Forest Sale Schedule for 1997 and the following five year period of fiscal years 1998 through 2002. As is shown in this schedule and the summary in Table 3, the timber volume projected to be offered from the Tongass is approximately 225 MMBF per year for the next five years, or about 42 MMBF less than the average annual ASQ of 267 MMBF. However, when sales with a high potential for challenge are factored in, the net probable sale offering for the next five years is approximately 123 MMBF per year. The Ketchikan Area portion of the ASQ for the next ten years is 102 MMBF on an average annual basis. See Appendix B of the 1997 TLMP for a more detailed discussion. It is currently projected that about 93 MMBF would be available for harvest under the Control Lake Project and that the volume would be offered in multiple sales, several in each of years 1998, 1999 and 2000. For those three years the average annual volume sold from this project would be about 27 MMBF per year, or approximately 27% of the Ketchikan Area's yearly ASQ.

Areas Suitable for Timber Harvest

The following is a listing and short description for the Ketchikan Area of existing and possible future timber sale project areas, made up of logical groupings of VCUs. This represents the majority of sites on the Ketchikan Area with suitable acres for timber harvest.

Central Prince of Wales EIS VCUs 557, 577, 579-590, 598-601, 549-554 and 571-574.

The FEIS and ROD for this project were completed in July 1993 with a selected alternative volume of 287 MMBF. Timber sale offerings have been made to KPC under the long-term contract for most of the volume.

North Revilla EIS VCUs 732, 733, 735-740

The Record of Decision for 205 mmbf was signed in August, 1993. Most of the volume in this project was sold in a system of offerings to KPC under the long-term contract. One small area was re-evaluated with an EA and sold under the independent timber sale program.

Polk Inlet EIS VCUs 610-613, 618-622, 624, 674, 675

The Record of Decision for this project was signed in April, 1995. The selected alternative had 112 mmbf of timber volume that has been offered to both KPC and as independent timber sales. The last of the sales from this project are scheduled to be sold in 1999.

Upper Carroll EIS VCUs 737, 744, 746

The ROD for this project was signed in October, 1996, with a selected alternative volume of 34 MMBF. All of this timber has been sold.

Lab Bay EIS VCUs 527-540, 551

A ROD for 42 MMBF was signed in January, 1997. Approximately 1/3 of this volume was sold in 1997. The project is now under litigation.

Control Lake EIS VCUs 574-578, 591-597

[This project.]

Chasina EIS VCUs 677-681

A DEIS was published in February, 1997 and a Final EIS is expected to be completed early 1998.

Sea Level EIS VCUs 746, 753, 755-757, 759

Scoping for this project has recently been completed and a DEIS is expected to be published in early 1998. The FEIS is expected in late 1998.

Cholmondeley EIS VCUs in Management Area K19

Scoping for this project has recently been completed and a DEIS is projected in 1998. The FEIS is projected for 1999.

Port Stewart EIS VCUs 713-717,719, 722-723

The DEIS is projected to be completed in 1998 with the FEIS projected for 1999.
Moira EIS VCUs 694, 695, 699, 700-704

This project is scheduled for field investigations and scoping in 1998. The DEIS is planned for 2000.

Dall Island EIS VCUs in Management Area K22

Scoping is scheduled in 2002 with the DEIS in 2003 and FEIS in 2004.

Sukkwan EIS VCUs in Management Area K21

Scoping is scheduled in 2002 with the DEIS in 2003 and FEIS in 2004.

Gravina EIS VCUs in Management Area K41

Scoping and the DEIS are scheduled in 2000 with the FEIS projected in 2001.

Note that several sales on the schedule in Table 2 have not been listed above, including Luck Lake, Staney, North Thorne, Fire Cove, and Sunny Cove. These projects are located within the boundaries of the projects listed above.

DEIS

Reasons for Scheduling the Control Lake Project for Environmental Analysis

In addition to the Control Lake Project Area's relative ability to provide timber, other factors considered in scheduling it for environmental analysis at its projected timber volume level included:

1) This harvest level is consistent with the 1997 TLMP.
2) Sufficient volume has been determined to be available in the project area.
3) The number and location of Log Transfer Facilities, or other processing facilities, are sufficient to handle this volume of timber within a three year time frame.

Substantial changes in timber demand or other circumstances could affect the rate at which various areas proceed through the NEPA process or the timing of actual timber sale offerings, but these changes are not expected to alter the sequence for initiating and completing the NEPA process for various areas. Time periods of relatively low market demand provide an opportunity to increase available timber supply in anticipation of cyclical higher demand periods. All areas in which commercial timber harvest is authorized under the TLMP are expected to receive some level of timber harvest at some time if the Forest Plan is to be fully implemented. Total environmental impacts viewed in the long term are not expected to differ substantially depending upon the order in which different areas are entered. The "No-Action" Alternative of not proceeding with further harvest at the present is considered in detail in each timber sale project NEPA process. But generally, projects farthest along in the NEPA process are the most efficient and logical to consider for implementation first in order to meet timber supply, timber sale program, and Forest Plan objectives.

Table 1
TLMP Projected Acres of Harvest by Decade
for the Project Area VCUs

Acres by Decade

	1	2	3	4	5
VCU					
574	120	40	120	0	0
575	59	253	59	80	0
576	0	0	0	0	0
577	957	180	1438	981	0
578	440	120	319	320	0
591	205	20	116	0	0
592	0	0	0	0	0
593	114	278	82	309	101
594	271	581	271	453	472
595	220	542	220	521	117
596	73	72	72	72	79
597.1	168	0	60	32	0
597.2	862	80	280	940	0
Total	3489	2166	3037	3708	769

Table 2
Tongass National Forest Timber Sale Schedule
Fiscal Years 1997 - 2002

Chatham Area

NEPA Project	Sale Name	Volume (MMBF)
FY 97		
SEIS	Humpback/Gallagher	21.3
SE Chichagof	Inbetween (AWRTA)	5.7
NW Baranof	Water World	8.7
NW Baranof	Duffield	20.6
SE Chichagof	Crab Bay (AWRTA)	7.8
Hoonah RD Salvage	Roadside Salvage	0.2
FY 98		
NW Baranof	Lisa Creek	6.0
NW Baranof	Schultz Cove	10.4
Port Houghton	North Houghton	11.0
Port Houghton	Little Lagoon	19.0
FY 99		
NW Baranof	St. Johns	10.7
8-Fathom	Neka	8.0
NW Baranof	Rod N' Apple	9.0
Indian River	Indian River 1	15.0
FY 00		
Port Houghton	Haystack 1	14.0
Finger Mountain	Broad Creek	21.0
Indian River	Indian River 2	9.0
FY 01		
8-Fathom	Salt Lake Bay	5.0
Finger Mountain	Crab Bay II	25.0
Kennel Creek	Kennel Creek	10.0
FY 02		
Ushk Bay	Poison Cove	19.1
Indian River	Indian River 3	10.0
Port Houghton	Haystack 2	15.0

Stikine Area

NEPA Project	Sale Name	Volume (MMBF)
FY 97		
N&E Kuiu	Rowan Settlement	8.0
South Lindenburg	South Lindenburg 1	15.0
ATC	PRD ATC	5.0
King George	King George	24.0
Froot Loops	Loop	0.5
Nootkatensis	Nootkatensis	0.6
Pathway	Pathway	0.3
Mossy	Mossy	0.3
Bowl	Bowl	0.2
Etolin	Etolin	1.0
Turn	Turn	1.2
PRD Small Sales	Misc Small Sales	2.0
FY 98		
Shamrock	Clover	12.0
N&E Kuiu	Rowan Mt.	16.0
N&E Kuiu	Crane	7.0
Todahl Backline	Todahl Backline	6.0
East Falls	East Falls	6.0
Canal/Hoya	Canal/Hoya	20.0
Nemo Loop	Nemo Loop	1.0
Donut	Donut	1.0
Salvage	Salvage	1.0
Misc Small Sales	Misc Small Sales	2.0
FY 99		
Port Houghton	Fanshaw 1	31.0
Crystal Creek	ESS	16.0
South Zarembo	South Zarembo	20.0
Kuakan	Kuakan	17.0
WRD Small Sales	Misc Small Sales	2.0
PRD Small Sales	Misc Small Sales	2.0
FY 00		
Mad Critter	Mad Critter	25.0
Woronofski	Woronofski	10.0
South Lindenberg	South Lindenberg II	10.0
Woodpecker	Woodpecker	15.0
East Kuiu	Kuiu I	22.0
WRD Small Sales	Misc Small Sales	2.0
PRD Small Sales	Misc Small Sales	2.0
FY 01		
Douglas	Douglas I	44.0
Frenchy	Frenchy	3.0
Etolin	Mosman	25.0
WRD Small Sales	Misc Small Sales	5.0
PRD Small Sales	Misc Small Sales	2.0
FY 02		
Etolin	Whaletail	25.0
East Kuiu	Kuiu II	40.0
Sumner	Sumner	6.0
WRD Small Sales	Misc Small Sales	5.0
PRD Small Sales	Misc Small Sales	3.0

Ketchikan Area

NEPA Project	Sale Name	Volume (MMBF)
FY 97		
Heceta Sawfly	Heceta Sawfly	11.2
KRD LYD	KRD LYD	0.2
Lab Bay	As Is	0.2
Lab Bay	Bob It	1.2
Lab Bay	Junction	0.3
Lab Bay	Lwr Big Creek	0.8
Lab Bay	Ridge	0.7
Lab Bay	Rock King	1.4
Lab Bay	Shakedown	3.2
Lab Bay	Woodpecker	0.3
Lanc'er Sal	Lanc'er Sal	1.1
Mtn Beaver	Mtn Beaver	1.0
Naukati/Sar	Naukati/Sar	22.9
Polk Inlet	Sentinel	5.8
Relief Sal	Relief Sal	0.3
Small Sales	Small Sales	3.2
Thorne Log Yard	Thorne Log Yd	0.1
Upper Carrol	Upper Carrol	30.0
FY 98		
Chasina	Dumpy ATC	9.7
Control Lake	Beaver Pond	0.3
Control Lake	Big Salt	13.2
Control Lake	Hard Steel	6.7
Control Lake	Lwr Beaver	0.2
Control Lake	Muskrat	0.4
Control Lake	Nth Thorne	2.7
Control Lake	Rio Beaver	5.3
Control Lake	Rush Fash	1.6
Control Lake	Rush/Angel	9.0
Control Lake	West Steel	0.2
Control Lake	Wolf Pup	1.5
Fire Cove	Fire Cove	4.0
KRD LYD	KRD LYD	0.2
Lab Bay	Perue LK	12.4
Lab Bay	Summit LK	16.4
LYD & Small Sales	LYD & Small Sales	2.0
Polk Inlet	Cable/Drop	11.0
TB Small Sales	TB Small Sales	5.0
FY 99		
Chasina	North	7.5
Chasina	Port J	11.0
Chasina	South Arm	7.9
Control Lake	Control Lake	10.0
Control Lake	Gander	5.2
Control Lake	Kogish	7.5
Control Lake	Logjam	1.8
Control Lake	Steel/Rbrts	3.9
CPOW Cleanup	B and E	2.5
CPOW Cleanup	K Jim	1.0
CPOW Cleanup	Neck Lake	1.8
CPOW Cleanup	Whale Pass	2.7

NEPA Project	Sale Name	Volume (MMBF)
FY 99 (Con't)		
LYD & Small Sales	LYD & Small Sales	2.0
Polk Inlet	Longline	2.9
Polk Inlet	Lowboy	1.1
Sea Level	Madder	10.0
Sea Level	Ten Pin 3	10.0
Sea Level	Toe-Dance	10.0
Small Sales	Small Sales	0.5
TB Small Sales	TB Small Sales	5.0
FY 00		
CG Small Sales	CG Small Sales	2.0
Cholmondeley	Dr. Point	16.7
Control Lake	Control Lake	12.0
Lab Bay	Thorne Island	3.5
Luck Lake	Luck Lake 1	5.0
Luck Lake	Luck Lake 2	8.0
Sea Level	Orion	20.0
Staney	Staney Creek 1	10.0
Sunny Cove	Sunny	14.0
TB Small Sales	TB Small Sales	5.0
FY 01		
Cedar Decline	Cedar	5.0
CG Small Sales	CG Small Sales	2.0
Cholmondeley	Skowl	6.7
Moira	Perkins	23.0
Port Stewart	Mongoos	30.0
Staney	Staney Ck 2	10.0
Staney	Staney Ck 3	15.0
TB Small Sales	TB Small Sales	5.0
FY 02		
CG Small Sales	CG Small Sales	2.0
Control Lake	Control Lake	9.6
Gravina	Dutchman	8.0
Gravina	Palisade	7.0
KOS OG	KOS 1	8.0
KOS OG	KOS 3	3.0
Moira	Black	11.3
Moira	Frederick	11.0
N Dall	Dall	10.0
North Thorne	Thorne 1A	4.5
North Thorne	Thorne 2	5.0
Port Stewart	Cabala	20.0
TB Small Sales	TB Small Sales	5.0

Table 3
Timber Sale Schedule Summary
Volume (MMBF) by Fiscal Year

	FY 97	FY98	FY99	FY00	FY01	FY02	FY 98-02 Ave.
Chatham Area	64	46	43	44	40	44	43
Stikine Area	58	72	88	86	79	79	81
Ketchikan Area	84	102	104	96	97	104	101
Tongass NF	206	220	235	226	216	228	225

Appendix B

Responses to Comments and Subsistence Hearing Testimony

Responses to Comments

This section of Appendix B includes the written corresondence received on the Draft EIS. Forest Service responses to substantive comments included in written correspondence are provided along-side the comments. Subsistence hearing testimony and Forest Service responses are provided in the second section of this Appendix.

Availability of the Draft EIS was announced in the *Federal Register* in autumn 1995 with a deadline for public comment listed as December 26, 1995. Copies of the Draft EIS were mailed to all on the project mailing list. Notices of the availability of the Draft EIS and announcing the schedule of public open houses and subsistence hearings were placed in the *Ketchikan Daily News* and the *Island News.* Additional notices to radio stations and newspapers in the region were issued.

Approximately 170 individuals, organizations, and agencies submitted 490 written comments on the Draft EIS. Even though the comment period closed at the end of 1995, letters received in early 1996 were also included in our analysis.

The comments printed in this appendix are organized into several groups. Agency letters are listed first, followed by letters from organizations and then letters from individuals. In several cases, a number of letters were received that were substantially similar in terms of the comments they contained. In these cases, one or two representative letters are reprinted in this appendix and the names of the authors of the other letters in the group are identified. Other similar letters are referenced in the Table of Contents to the letter that was responded to. Substantive comments within each letter have been coded and numbered to aid the reader in finding the Forest Service response to individual comments.

Following is a listing of the comment letters provided in the subsequent pages. The originator of the comment is listed together with the comment codes and the beginning page number of the letter.

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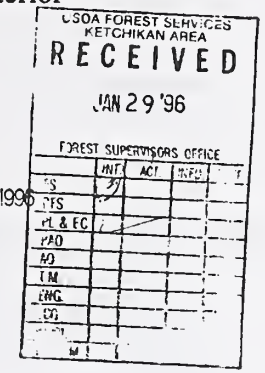
Comments of U.S. Department of Interior

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1689 C Street, Room 119
Anchorage, Alaska 99501-5126



ER 95/780

Mr. Bradley Powell
Forest Supervisor
Ketchikan Area
Tongass National Forest
Federal Building
Ketchikan, Alaska 99901

Dear Mr. Powell:

In response to your request, we have reviewed the October 1995 Control Lake Timber Sale Draft Environmental Impact Statement (EIS). We offer the following comments for your consideration.

GENERAL COMMENTS

CUMULATIVE IMPACTS AND WILDLIFE

USDI-1 We remain concerned about the cumulative effects of this project with numerous other ongoing and proposed timber harvests on Prince of Wales Island and throughout the Tongass National Forest. We are particularly concerned about current and future management of rainforest habitats and how this will affect many species' long-term viability. Therefore, we suggest environmental impact analyses for the Control Lake Timber Sale include an in-depth cumulative impact discussion. We believe timber harvest on nearby private lands should be identified and the cumulative impacts on fish, wildlife, and their habitats associated with this sale and adjacent private sales and/or Forest Service harvest areas need to be quantified and assessed.

USDI-2 In particular, we are concerned about the long-term presence of the Queen Charlotte goshawk. The Fish and Wildlife Service (FWS) recently evaluated the status of this subspecies under the Endangered Species Act. A "not warranted at this time" finding was issued on May 19, 1995. In part, that decision was based on expectations of the Forest Service to employ species-specific protection strategies. Consequently, efforts to conserve this and other species have continued to be recommended by the Service and other resource agencies for implementation in the Tongass Land Management Plan (TLMP) revision and in numerous individual timber sales, such as this Control Lake Sale. We encourage the Forest Service to implement a conservative ecosystem (forest-wide) approach in the final planning for this proposed project.

Responses to U.S. Department of Interior

USDI-1 Chapter 3, Biodiversity section, of the EIS addresses how the Control Lake project area will contribute to the maintenance of viable populations of wildlife. This was considered in the cumulative effects analysis. The Forest Plan, and its revisions, address viability of wildlife populations on a Forest-wide level, including cumulative effects. The 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining well-distributed, viable populations of wildlife species on the Tongass.

USDI-2 An ecosystem management approach was used in the planning of the Control Lake timber sale. This approach is maintained in the SDEIS (see Chapter 2 and Chapter 3, Biodiversity, of the SDEIS). The 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining well-distributed, viable populations of wildlife species on the Tongass. The goshawk received additional standard and guidelines in the Record of Decision for the 1997 TLMP Revision EIS designed to strengthen the overall viability strategy. Rationale for this is included in Appendix N of the TLMP Final EIS. Although the goshawk standard and guidelines are not triggered for the VCU's in the Control Lake project, proposed harvest treatments that leave structure within clearcuts and that are alternatives to clearcutting implement those guidelines at least partially if not completely in most harvest units.

Comments of U.S. Department of Interior

USDI-3 We believe the Control Lake Timber Sale plan should remain flexible to include anticipated management changes in the revised TLMP addressing viable wildlife populations and forest fragmentation issues. We encourage inclusion in all project alternatives, old-growth forest reserves and wildlife travel corridors that meet the criteria of the interagency Viable Population Committee's draft strategy, A Proposed Strategy for Maintaining Well-Distributed, Viable Populations of Wildlife Associated with Old-Growth Forests in Southeast Alaska (with peer review suggested modifications).

SPECIES OF CONCERN

USDI-4 As a result of a recent FWS policy change, those species formally labeled as "Category 2" are no longer called "candidates." Rather, the term "species of concern" is now used. The FWS, Forest Service, and Alaska Department of Fish and Game (ADF&G) are cooperating in the preparation of conservation assessments for the Queen Charlotte goshawk, Alexander Archipelago wolf, and the marbled murrelet in accordance with the December 1994 Interagency Memorandum of Understanding. Long-term land management requirements of these and other old-growth dependent species are also being addressed through revision of the TLMP. We believe the Final EIS should identify how the proposed timber sale will meet and support those on-going efforts.

Several timber sale proposals, including the Control Lake Sale, are currently at various stages in the National Environmental Policy Act (NEPA) process. Collectively, these sales are expected to have widespread adverse effects on habitat for the goshawk, wolf, and other old-growth forest associated species by removing old-growth forest and fragmenting large old-growth blocks, which are critical for maintaining viable, well-distributed populations of wildlife across the forest landscape. Given the ongoing, cooperative interagency efforts to gather more information on goshawks and wolves, as well as their habitat requirements throughout the Tongass National Forest, we believe the Final EIS should state how the proposed timber sale will meet and support those efforts.

USDI-5 We suggest that cumulative impact analyses be conducted for goshawks and wolves prior to identification of a selected alternative for this sale. We suggest these cumulative impact assessments be conducted at the landscape level to address losses of habitats throughout the Prince of Wales Island area. We suggest subsequent NEPA documents for the Control Lake Timber Sale and other sales located on Prince of Wales Island should show these cumulative effects on goshawks and wolves.

Queen Charlotte Goshawk

USDI-6 A May 1995 analysis by FWS found that listing the Queen Charlotte goshawk as endangered pursuant to the Endangered Species Act was "not warranted at this time" based upon insufficient scientific and commercial information. The on-going interagency conservation efforts were also considered important in the Director's decision. We remain concerned, however, about the status of the Queen Charlotte goshawk.

Responses to U.S. Department of Interior

USDI-3 The Control Lake project has remained flexible as evidenced by the revision of the purpose and need, the modification of the alternatives analyzed in detail, the issuance of this SDEIS, and the incorporation of the latest old-growth retention strategy adopted by the 1997 TLMP Revision. The revised alternatives within the supplement to the DEIS are fully consistent with the 1997 TLMP Revision.

USDI-4 As noted above, the Control Lake project purpose and need, the alternatives analyzed in detail, and the old-growth retention strategy have been revised, partly in response to changes in the system of old-growth reserves included in the 1997 TLMP Revision. Control Lake is a Category 3 timber sale project as identified in the 1997 TLMP ROD and has been deemed consistent by the US Fish and Wildlife Service. Also see responses to USDI-5 and USDI-6 below.

USDI-5 Current and future timber sale planning on Prince of Wales Island is performed in compliance with state and federal law and tiers to the direction provided in the Forest Plan (TLMP 1997). The 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining well-distributed, viable populations of wildlife species on the Tongass. This strategy was developed partly in response to cumulative effects on goshawks and wolves at the landscape level. Cumulative effects on these species are also addressed in the Control Lake DEIS and in the SDEIS. See also Appendix N of the 1997 TLMP Final EIS.

USDI-6 The old-growth reserve strategy incorporated in the SDEIS is a strategy that includes large blocks of old-growth forest and is part of a Forest-wide strategy designed to maintain well-distributed, viable populations of the Queen Charlotte goshawk and other wildlife. The Control Lake project also incorporates the latest standards and guidelines for goshawks defined in the 1997 TLMP Revision.

Comments of U.S. Department of Interior

USDI-6 (cont.) Although more information is needed to determine the specific effects of past timber harvest, currently available information suggests that large blocks of old-growth forest are necessary for goshawks. We suggest that, to the extent statutorily possible, a habitat conservation management approach be taken in the Final EIS to maintain options required to conserve this species by maintaining existing large blocks of mature forest.

Marbled Murrelet

USDI-7 Marbled murrelets typically are associated with mature, old-growth forest habitat that provides one or more critical elements of their life requirements. The proposed harvest would result in loss of such habitat, and may have significant impacts on this species and its future existence in the Prince of Wales Island area. Research conducted in the murrelet's Pacific Northwest range demonstrate a cause and effect relationship between loss of mature forest and a reduction of murrelet populations.

The Draft EIS states that murrelet surveys conducted on Control Lake Project Area documented their presence in 96 percent of the stands examined. Old-growth forest remaining and average patch size effectiveness indices for all alternatives show an overall reduction of such habitat (p. 4-112).

We believe the Final EIS should identify what actions are proposed and/or will be implemented to conserve marbled murrelet habitat and nesting sites. We suggest a landscape management plan be developed that will include monitoring and retention of large tracts of mature, old-growth forest with suitable branch structure to support murrelet nests. In addition, we suggest studies be conducted on their habitat requirements on project-wide and forest-wide scales.

Alexander Archipelago Wolf

USDI-8 A 12 month "not warranted" finding for the Alexander Archipelago wolf was published in the Federal Register on February 23, 1995, pursuant to the Endangered Species Act. However, FWS remains concerned about the direct and indirect impacts to wolf populations occurring on Prince of Wales Island as a result of timber harvesting. Prince of Wales Island may support as much as one third of the total wolf population in Southeast Alaska (Bowyer et al. 1994). The proposed Control Lake Timber Sale includes some of the largest areas of unlogged old forest habitat on Northern Prince of Wales Island.

Threats to the wolf include the reduction and long-term degradation of the habitat for the wolf's primary prey species, the Sitka black-tailed deer, from clear-cutting and the development of an extensive open road system. Clear-cutting has an adverse cumulative impact on deer populations by reducing suitable habitat. The Draft EIS acknowledges that by 2054 wolf habitat capability is projected to decline by 70 percent in the project area due to loss of available prey (Sitka black-tailed deer). Ultimately, large scale habitat conversion or degradation often associated with various stochastic events will result in severely reduced populations of Sitka black-tailed deer, with a corresponding reduction in the wolf population.

Responses to U.S. Department of Interior

USDI-7 Refer to responses to USDI-5 and USDI-6. The Control Lake project also incorporates the latest standards and guidelines for marbled murrelets defined in the 1997 TLMP Revision.

USDI-8 Population viability on the Tongass National Forest is addressed in the 1997 TLMP Revision. These issues cannot be addressed solely through individual project design, as the resources are managed on a larger scale. Due to concerns regarding the accuracy of the habitat capability models, the 1997 TLMP Revision instead conducted viability analyses for selected individual species. See also Appendix N of 1997 TLMP Final EIS. For black-tailed deer, a revised habitat capability model was developed. Results of this model are addressed in this SDEIS. The habitat capability model is intended to provide a relative comparison between alternatives of the effects of the proposed action on habitat. The model does not predict actual population numbers.

Empirical data on wolf populations in the project area provided by D. Person has been incorporated into the SDEIS analysis and into the design of Alternative 11. Units and areas of highest concern for wolves have been avoided under Alternative 11.

See response to SEAC-11 relating to project cumulative effects.

Comments of U.S. Department of Interior

USDI-8 (cont.) The FWS estimates that within the next 10 to 30 years, given historic old-growth timber harvest on Federal, State, and Native corporation lands, significant localized reductions in the Alexander Archipelago wolf populations will occur as clearcut areas transform into second growth stands, thus rendering such areas unusable by deer. The current wolf and Sitka black-tailed deer habitat capability models used for analyzing the effects of projects on wildlife habitats are outdated, overly simplistic, and are not useful in determining population viability (Kiester and Eckhardt 1994). More empirical information is available and, we believe, should be used in the Final EIS to update these models before an analysis is completed.

USDI-9 We believe the Final EIS should consider alternative harvest methods that minimize or reduce road construction. We suggest helicopter yarding to existing roads, in combination with sufficient road closures and enforcement actions be planned and included in the Final EIS. The Forest Service, we believe, should address ways to improve wolf populations, including maintaining habitat for deer, minimizing habitat fragmentation and road construction, and development and implementation of monitoring programs. We suggest the effectiveness of on-going land management activities be addressed. We suggest the Final EIS address mitigation measures and identify areas that have restoration potential.

USDI-10 We suggest the Final EIS include a discussion of wolf harvest effects on the Tongass National Forest, Prince of Wales Island, and in the project area, including an analysis of the influence of increased access.

FISHERIES

USDI-11 A recent report to Congress, (Anadromous Fish Habitat Assessment, January 1995) concluded that the Best Management Practices (BMP) currently employed across the Tongass National Forest were inconsistently applied and failed to adequately protect fish habitat. The report stated that a more conservative approach to protect fish habitat should be taken.

Several subwatersheds have been identified as being at higher risk of road sediment delivery (p. 4-50): Rio Beaver, Nossuk River, Logjam, Control Creek, and North Thorne River. The Draft EIS states it is imperative that BMPs be fully implemented to protect these areas. Based on the January 1995 report, it does not appear that the BMPs may provide adequate protection. We believe the Final EIS should describe what additional measures will be employed to ensure these sub-watersheds are protected.

USDI-12 The effect of all alternatives on fish habitat over time will be a reduction in the amount of woody debris supplied to Class III streams within a given watershed (p. 4-29). We suggest that the Fianl EIS address the need for Class II and Class III streams to have additional buffers to maintain large woody debris for soil stabilization, prevent the loss of nutrients, reduce sedimentation that can degrade downstream fish habitat, and prevent blow downs caused by high winds.

Responses to U.S. Department of Interior

USDI-9 Helicopter yarding has been fully evaluated in the Control Lake timber sale planning process. Helicopter yarding is proposed for areas where road access is not feasible, or where significant resource concerns require the use of a reduced impact silvicultural prescription and logging system. Helicopter yarding is approximately twice the cost of conventional cable yarding methods, with yarding distance being the most important cost factor. Stands with low per acre volumes and greater than an average of one mile from a roaded landing area are generally not economically feasible for helicopter yarding systems. However, in order to further reduce road construction in Alternative 11, several units in VCU's 593 and 594 were changed to helicopter yarding specifically for this alternative.

Deer habitat, fragmentation, construction of new roads, road closures, mitigation and monitoring were considered in the design of alternatives, and are discussed in the SDEIS. The SDEIS identifies sites suitable for pre-commercial thinning for improvement of deer habitat. It also proposes closure of approximately 56 miles of existing roads that are currently open to vehicular traffic, along with most of the new roads proposed in each alternative. This represents a more aggressive road closure proposal than was included in the DEIS. The Thorne Bay Ranger District has begun work on a District-wide access management program that will be done with other agencies and the public. This should lead to a more effective and acceptable road management strategy for all parties.

USDI-10 Evaluation of effects of timber harvesting on wolves on a Forest-wide basis is outside the scope of the project-level EIS. The 1997 TLMP Revision addresses the issue of population viability for wolves across the Forest, and proposes new standards and guidelines for protection of wolves. An access management strategy for the Control Lake project area was developed as part of this SDEIS, and is discussed in the Transportation and Facilities section of Chapter 4.

USDI-11 Appendix E in this supplement to the DEIS summarizes watershed assessment efforts used in the Control Lake project. See responses to SEAC-26, SEAC-36, and ADEC-1.

Comments of U.S. Department of Interior

USDI-13 The National Forest Management Act establishes that management activities having serious and adverse effect to fish habitat shall not be permitted. The Tongass Timber Reform Act (TTRA) provides direction for fish protection in section 103(a). We believe the Final EIS should identify what method of monitoring will be used to ensure compliance with these requirements, including the frequency of inspections and the percentage of units inspected within Polk Inlet, Central Prince of Wales Island, Lab Bay, and Control Lake. We suggest that a cumulative analysis of past

USDI-14 and current fish habitat losses within the sale area and adjacent timber sale units be included in the Final EIS. A cumulative impacts analysis should address fisheries resources on both public lands and private lands.

USDI-15 Aquatic vegetation (i.e., sea grasses) occurring within the tidal and subtidal zones of estuaries are important to a variety of aquatic species. Direct, indirect, secondary and cumulative impacts of bark deposition, shading, and storage of logs on these special aquatic resources should, we believe, be fully addressed in the Final EIS. We suggest the potential effects on marine and intertidal resources of sport, subsistence and commercial value be described and considered in the document's impact analysis.

USDI-16 Hopefully, the Forest Service's efforts to minimize impacts to fish habitat will result in long-term maintenance of healthy fish populations. We believe a monitoring plan should be established to ensure remedial actions are implemented when adverse impacts are discovered. We suggest that an index of health be developed for anadromous and resident fish streams potentially impacted by this project. Annual monitoring of age-class distribution would be helpful to verify that successful reproduction continues. We suggest the Final EIS address these plans.

USDI-17 We suggest the Final EIS use the catalog numbering system employed by the ADF&G, where applicable. The numbering system is currently used in the Atlas and Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes.

USDI-18 **OTHER TRUST RESOURCES**

Sidle (1985) found that species richness can be greatly influenced by timber harvesting. Thirteen old-growth dependent species declined to three species following timber harvesting. As vegetation evolved through the early successional stages, species diversity increased. However, as understory vegetation was lost due to canopy closure species richness decreased.

As age structure and seed-producing coniferous forest declines due to clearcutting activities, specialized species, such as red crossbills, inevitably will decline, with possible local extinctions. We believe the Final EIS should address direct and cumulative impacts on these and other Federal trust species (e.g. neotropical migrant species) that could be affected by the loss of mature, old-growth forest and/or forested wetlands. We suggest surveys be conducted to determine population viability and distribution. The Final EIS, we believe, should include assessments that address habitat capability on a landscape level, and identify areas that produce large, low elevation cone crops for inclusion in retention areas.

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USDI-12 The Control Lake project included extensive watershed-related studies and a site-specific review of streams in and adjacent to harvest units. All Class I and II streams received a minimum of a 100-foot no-cut buffer. In addition, buffers were expanded along many streams. All Class III streams were evaluated and buffers were often prescribed along them, especially where steep v-notches occurred. Additional buffers may be added during final layout if layout crews decide specific reaches require further protection.

USDI-13 Monitoring activities associated with the project are addressed in Chapter 2. Also see responses to SEAC-40 and SEAC-41.

USDI-14 Cumulative effects on fish resources are addressed in Chapter 4 of the SDEIS. A recent cumulative effects analysis on a Forest-level was conducted for the 1997 TLMP Revision.

USDI-15 No new LTF or related facilities are proposed for Control Lake timber. Existing permitted facilities would be used and effects have already been considered in the permitting process for these continuing operations. Also see responses to EPA-4 through EPA-12.

USDI-16 See response to USDI-13.

USDI-17 Comment noted. Please note that the ADF&G Atlas does not include many streams and lakes. Collectively these uncataloged streams and lakes make up a significant portion of the fish habitat on National Forest System lands. Catalog numbers were used in Appendix D3 of the DEIS.

USDI-18 The management indicator species identified for the Tongass National Forest do not include neotropical migrants. Addition of new management indicator species is an issue that could be addressed at the Forest Plan level. Effects to neotropical migrants

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OLD-GROWTH BLOCKS

USDI-19 The Draft EIS states that Habitat Conservation Areas (HCA) will not be implemented in response to Section 502(a) of Public Law 104-19 which was signed by the President on July 27, 1995. It is the our understanding that this law is no longer in effect as of September 30, 1995. The Draft EIS is dated October 1995. We suggest that implementation of HCAs or reserves be considered during planning of the Control Lake Timber Sale and included in the Final EIS. We encourage inclusion of large, medium, and small old-growth forest reserves or HCAs and wildlife travel corridors in all project alternatives, as defined in the interagency Viable Population Committee's draft strategy, A Proposed Strategy for Maintaining Well-Distributed, Viable Populations of Wildlife Associated with Old-Growth Forests in Southeast Alaska (with the peer review suggested modifications).

The Draft EIS shows that a project specific old-growth retention strategy has been incorporated into this project (p. 4-126) and states that timber harvests generally are excluded from old-growth blocks because the harvest would reduce their effectiveness. However, Alternative 9 would harvest 345 acres in a large, old-growth block, 76 acres in small old-growth blocks, and 1,002 acres in the corridors. Alternative 2, would allow harvesting of 4,696 acres within the blocks and corridors. As Kiester and Eckhardt (March 1994) stated, natural fragmentation must be clearly understood before management-induced fragmentation can be properly evaluated. We believe the Final EIS should clarify the intent of the old-growth retention strategy if harvesting will result in further old forest fragmentation and reduced block and corridor sizes. We suggest the Final EIS include a map showing the old-growth retention block locations for selected alternatives.

USDI-20 We suggest that the Final EIS consider Honker Divide as a long term retention area or HCA because it represents the largest contiguous, unroaded, old-growth block remaining in the central and northern portions of Prince of Wales Island. The ADF&G has recognized this area as one of the most important wild habitat areas in Southeast Alaska. We believe the Forest Service may be limiting options for maintaining viable, well distributed wildlife populations by entering Honker Divide for timber harvest, and suggest this be addressed in the Final EIS.

USDI-21 The Draft EIS states that future harvests will shift away from the northern and central Prince of Wales Island towards the island's south-central areas. We suggest the Final EIS explain the rationale for selecting this old-growth refugia instead of selecting units in south-central Prince of Wales Island where species richness and diversity are less.

WETLANDS

USDI-22 Degradation of wetlands caused by heavy equipment impacting vegetation, impairment of natural drainage patterns, loss of nesting and foraging habitat for migratory birds and small mammals, and displacement or mortality of game species, including black-tailed deer, black bear, and wolf, are of concern. Such habitat alteration can result in permanent hydrologic change, and, in some cases, loss of functional wetlands. We suggest the Final EIS address the project's cumulative impact on wetlands and how the goals of Executive Order 11990, as amended, will be met to avoid, to the

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USDI-18 (cont.) can be estimated for the Control Lake project by examination of MIS model results for old-growth dependent bird species such as the brown creeper, hairy woodpecker, and red-breasted sapsucker which use similar habitat and would be similarly affected by timber harvest.

The project area contributes to the maintenance of population viability through maintenance of large, unfragmented blocks of old-growth habitat, and corridors connecting them, as well as designation of beach and estuary fringe, stream buffers, and other no-harvest areas. These areas include low elevation coniferous forest and forested wetlands and will contribute to the maintenance of viable populations of wildlife species. The 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy similar for maintaining well-distributed, viable populations of wildlife species Forest-wide.

USDI-19 Public Law 104-19 no longer applies and, as noted above, the 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining well-distributed, viable populations of wildlife species Forest-wide. The Control Lake SDEIS presents a map of this strategy for the project area and addresses the effects of each alternative on the strategy.

USDI-20 The old-growth strategy incorporated by the 1997 TLMP Revision includes the Honker Divide area as an Old-Growth Habitat LUD, as well as several other areas. The SDEIS alternatives are analyzed in relation to the LUD's.

USDI-21 The discussion regarding future harvest on Prince of Wales Island was based on the locations of land use designations (LUD's) where timber harvest was permitted, as defined under Alternative P of the 1991 TLMP RSDEIS. These discussions have now been revised to correspond with the 1997 TLMP Revision. The issue regarding which parts of Prince of Wales Island should be logged and which parts should be set aside as old-growth retention or

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USDI-22 (cont.) extent possible, the long- and short-term adverse impacts associated with destruction or modification of wetlands.

USDI-23 During road construction some excavation of wetland overburden is required. We suggest the direct, indirect, and cumulative impacts associated with disposal of this material be discussed in the Final EIS. We also suggest that total cubic yards to be removed and procedures for overburden disposal be described in the Final EIS.

USDI-24 We believe the Final EIS should identify appropriate mitigation to offset unavoidable adverse impacts which remain after all minimization efforts have been met. The objective of mitigation for unavoidable impacts is to offset environmental losses. We support restoration that returns function and value to impacted areas. Some examples would include, but not be limited to: returning wetlands to pre-existing condition by removing old road beds, reestablishing buffer strips along pre-TTRA streams, and preservation of significant habitats.

USDI-25 We suggest the Final EIS include information to support the belief that forested wetlands prescribed for harvest are capable of regenerating on a sustainable yield basis. The analysis should also demonstrate the rate of growth expected on hydric soils.

LOG TRANSFER FACILITY (LTF) SITES

USDI-26 We suggest that National Pollutant Discharge Elimination System monitoring reports be included in the Final EIS. We suggest bark accumulation monitoring be implemented and permanent transects established prior to operation of any log transfer facility. Any modifications proposed for existing LTFs, we believe, should be described in the Final EIS, along with a discussion of impacts associated with fill activities. We suggest that compensatory mitigation for the net loss of estuarine habitat as a result of bark accumulation be included in the Final EIS.

USDI-27 We suggest that the Final EIS address existing bark depth at the LTF sites, and identify what mitigation measures would be implemented if bark accumulation is found to exceed the Alaska Timber Task Force (ATTF) Guidelines. If any site is found to exceed the limitations established in the ATTF Guidelines, we suggest a mitigation plan to address clean-up measures and establish time-frames be included in the Final EIS. We believe that dive reports should become part of the Final EIS.

USDI-28 Additional impacts directly affecting marine mammals and other aquatic life using the project areas are associated with LTF sites and relate to improper disposal of solid waste materials . We believe appropriate mitigation, along with effective enforcement measures to eliminate such improper disposal, and removal of existing solid waste materials should be described in the Final EIS.

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USDI-21 (cont.) some other land use designation in which logging is not permitted, is clearly a Forest Plan level issue. See Appendix A in the SDEIS for project-related scheduling.

USDI-22 The DEIS and SDEIS discuss the effects of the action alternatives on wetlands, mitigation measures, and how applicable Federal laws are addressed.

USDI-23 The excavation of wetland overburden during road construction is only required in situations where the wetland occurs on side slopes greater than 30 percent. Most wetlands crossed by proposed roads in the Control Lake project area are on slopes less than 15 percent. On the gentle slopes, roads are constructed using a rock fill on top of the wetland and providing cross drainage under the roadbed. On side slopes that require the excavation of overburden, this material is deposited within the existing road right-of-way if it is stable, or to an approved disposal site.

USDI-24 Refer to response to USDI-22. Additionally, riparian areas along streams harvested prior to TTRA implementation are regrowing. Riparian and wetland areas are considered by the Forest when allocating restoration and K-V Funds.

USDI-25 The TLMP planning team established a committee to review the issue of determining whether forested wetlands are suitable for timber harvest. The committee concluded that timber harvest of forested wetlands is within legal requirements. It is also their opinion that while the productivity and response information is limited, it is sufficient to retain these soils in the tentatively suitable land base. However, because the scientific information related to the effects of timber harvesting on forested wetlands on certain soil types (i.e., Kaikli, Karheen, Kitkum, and Maybeso soil series) is incomplete, the information needs section of the Forest Plan describes an ongoing research study of these issues. Therefore, because such effects are unknown, and specific concerns for these four soil types exist, this project avoids harvesting on these four forested wetland soils. Because it is not always possible to identify small inclusions of these soils within a larger area of another soil type, instances where two acres or less

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USDI-29 We suggest that an underwater survey be conducted at each existing LTF, and if sites are found to exceed bark accumulation guidelines, other alternative methods of log transfer (e.g., barging) be addressed in the document.

ROADS

USDI-30 We are concerned about the effectiveness of the Forest Service's road closure measures. The FWS has observed that implementation of proposed road closures has not eliminated or controlled access to affected fish and wildlife habitat areas. We believe post-timber operation road closures as mitigation for adverse impacts on wildlife populations is of minimal benefit to fish and wildlife if road closures cannot be enforced. We recognize that road construction, maintenance and repair are extremely expensive, and suggest the Final EIS include an analysis for utilizing helicopter yarding as an alternative harvest method to reduce the need for additional roads. Helicopter yarding reduces the need to construct roads on soils with mass movement indices, reduces impacts caused by sediment loading of streams, reduces road related landslides, protects karst landscapes, and protects wetlands and habitat. Helicopter yarding also reduces the amount of old-growth timber permanently removed by construction of roads. We suggest that short- and long-term road maintenance cost analyses be included in the Final EIS.

USDI-31 **SECONDARY/CUMULATIVE IMPACTS**

We suggest the Final EIS include an analysis of how future non-federal land development will affect wildlife populations and their habitats on Prince of Wales Island, using the expected rate of growth of human populations in logging camps/communities, and associated development (e.g., subdivisions, schools).

USDI-32 **MONITORING, ENFORCEMENT AND REHABILITATION PROGRAMS**

We suggest that specific monitoring plans be displayed for aquatic, marine, and terrestrial fish and wildlife habitats in the Final EIS, rather than merely acknowledging that such plans will be developed and implemented at a later date. We believe plans should include monitoring frequency, priority, and corrective measures. Monitoring, enforcement and rehabilitation programs require a commitment of personnel and budget. To ensure that such programs are maintained at a functional level, we suggest the Final EIS identify how funds will be committed and maintained throughout the life of the project. We suggest a cost analysis be included in the Final EIS.

USDI-33 **FIELD INVENTORIES**

The Draft EIS states that wildlife field surveys were conducted in 1993. However, it does not indicate the types of survey methodologies employed, the percentage of units covered, or the frequency or time of year that surveys were performed. We believe survey information in the Final EIS should be in sufficient detail to allow a meaningful evaluation of the impact of the proposed project on those species that may utilize the area. We suggest the sampling

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of these soils are harvested unintentionally was unavoidable. Regeneration will be certified on all wetland areas harvested.

USDI-26 See response to USDI-15.

USDI-27 See response to USDI-15.

USDI-28 See response to USDI-15.

USDI-29 See response to USDI-15.

USDI-30 A road access management plan has been developed for the Control Lake project area as part of the EIS. Most of the roads constructed for the project would be closed at the end of the sale; in addition, several miles of roads that are currently open would also be physically closed for resource protection. Roads will be closed primarily by physical means such as pulling bridges or culverts or constructing barriers to motor vehicles.

The Control Lake road closure points were selected in proximity to natural features such as stream crossings, to facilitate implementation. Implementation of the road closure plan will occur upon completion of the Control Lake sale, and will be conducted by District personnel.

Monitoring of roads and road maintenance is done through final road inspections. A monitoring form is prepared, an inspection is made, and additional work needed to bring the road to Forest standards is performed. The Ketchikan Area also monitors a random selection of roads during the annual interdisciplinary BMP's monitoring trip. Periodic inspections of roads by road maintenance staff, other Forest Service employees, other agency employees, and the general public also are used for monitoring. Roads are also monitored after any large scale natural events such as unusually heavy rains.

Helicopter yarding has been fully evaluated in the Control Lake timber sale planning process. Helicopter yarding is proposed for

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USDI-33 (cont.) methodologies and any variations within methods be described. The discussion should also include sampling dates, times, and any other factors that may influence the results of sampling. We suggest a map be included to identify the location of all pedestrian transects, trap grids, herpetology arrays, or other sampling plots used to determine the on-site status of species.

USDI-34 We suggest that the latest available scientific information be used to update the statistical wildlife models that will be used for wildlife habitats analysis in the Final EIS.

SPECIFIC COMMENTS

USDI-35 Chapter 1, Maps: Map stipples are hard to distinguish at the current scale. We suggest use of stipples that are distinguishably different, or use color coding.

USDI-36 Chapter 1, p 9, line 19 (text): VCU 592 is repeated twice.

USDI-37 Chapter 2, p 17, 1st paragraph: "...the second largest patch would be 5,948 acres in size...." We suggest the Final EIS state whether this is a reduction in the original size of the patch and if so, include the original acreage.

USDI-38 Chapter 2, p 44, Project-specific Monitoring: We suggest consideration of a multi-agency approach to conducting field evaluations.

USDI-39 Chapter 3, p 11, Minerals: Except for a short section on minerals within this Affected Environment section, and one reference to the Black Bear Lake prospect in the Environmental Consequences section, there are no other references to minerals. We suggest a summary and discussion of any mineral activity tracts that may be in the project area be included in the Final EIS.

Maps and descriptions of mineral activity tracts in this project area can be found in the Tongass Land Management Plan Revision Supplement to the Draft EIS (August 1991). Descriptions of these mineral activity tract locations on the Tongass National Forest are found on pages 3-132 to 3-134 in Table 3-44 and Figure 3-16 of that document. There are 52 tracts of various size, totaling 604,989 acres. We suggest this information be added to the Final EIS.

We also suggest use of the TLMP Revision Draft EIS (p. 3-147 through 3-155) description of the undiscovered mineral resources of the Tongass National Forest, which is based upon the 1990 U.S. Geological Survey open file report by Dave Brew.

USDI-40 Chapter 3, p 16, Figure 3-3: We suggest the Final EIS state what the shaded area represents.

USDI-41 Chapter 3, p 17, Erosion, last paragraph: "...or in watershed C95B.2000." Figure 3-3, Major Watersheds in the Project Area, does not identify watershed C95B.2000, we suggest this be corrected.

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USDI-30 (cont.) areas where road access is not feasible, or where significant resource concerns require the use of a reduced impact silvicultural prescription and logging system. Helicopter yarding is approximately twice the cost of conventional cable yarding methods, with yarding distance being the most important cost factor. Stands with low volumes per acre and greater than an average of one mile from a roaded landing area are generally not economically feasible for helicopter yarding systems. However, in order to further reduce road construction in Alternative 11, several units in VCU's 593 and 594 were changed to helicopter yarding specifically for this alternative. Also see the last half of our response to USDI-9.

USDI-31 Future development on private lands and human population growth are considered in the DEIS and SDEIS effects analyses. For example, the subsistence section evaluates wildlife habitat capability changes on both private and federal lands within a WAA and incorporates demand growth for projecting future harvest rates. See Appendix N of the 1997 TLMP FEIS for relationship of non-National Forest System lands to species viability and cumulative effects.

USDI-32 As discussed in Chapter 2 of the SDEIS, monitoring activities are divided into three broad categories: Forest Plan monitoring, routine implementation monitoring, and project-specific monitoring. Forest Plan monitoring is the most extensive and incorporates three levels: implementation monitoring, effectiveness monitoring, and validation monitoring. Results of this Forest Plan monitoring are published in "Annual Monitoring and Evaluation Reports" for each fiscal year. Routine implementation monitoring is part of a timber sale contract. Sale administrators and road inspectors ensure that the recommendations contained on the unit and road cards and the prescriptions are incorporated into contract documents and then monitor performance relative to contract requirements. Project-specific monitoring activities are additional to these other monitoring types and are identified in Chapter 2 of the SDEIS for the Control Lake project.

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USDI-42 Chapter 3, p 34, Stream Temperature: We suggest sample locations be noted on a map and included in the Final EIS.

USDI-43 Chapter 3, p 84, Beach Fringe and Estuary, 3rd paragraph: "Table 3-26 indicates that 2,249 acres...." Table 3-26 does not include this number. Inconsistency between table and text should be corrected.

USDI-44 Chapter 4, p 5, Geology, Minerals, and Karst: The discussion of direct, indirect, and cumulative effects on mineral resources is adequate, but we suggest that this section be revised to include appropriate information from the TLMP regarding mineral activity tracts and undiscovered resources. The Bureau of Mines and Geological Survey developed these tools for the Forest Service during the TLMP process and we suggest that they be incorporated into the Final EIS.

USDI-45 Chapter 4, p 37, Stream Temperature and Dissolved Oxygen, 5th paragraph: The Shinaku Creek, Upper Thorne River, and Steelhead Creek watersheds will have most vegetation removed along Class III streams (Table 4-10: total Project Area Class III streams in miles 584.8). We do not agree with the assumption that thermal increase is not likely to occur. The Draft EIS references prior fish kills in Thorne River and Steelhead Creek (1993) and states, "...fish kills, probably caused by high temperature or low dissolved oxygen...." If weather conditions similar to 1993 should occur again, it is likely that all streams (Class I, II, and III) will be affected. We believe further analysis is needed to better assess the potential impact to these streams as a result of this proposed sale.

USDI-46 Chapter 4, p 52, Road Construction Timing, Culverts, and Road Access Management: "...culverts would be monitored and maintained on a regular basis." We suggest the Final EIS define "regular" (i.e., weekly, monthly, etc.).

USDI-47 Chapter 4, p 102, 2nd paragraph: "...effectiveness of retaining structure during harvest is expected to be most evident towards the end of a stand's rotation cycle...." We believe waiting 100+ years to determine if retained structure is effective is unreasonable and tantamount to doing no analysis for the foreseeable future. We suggest the Final EIS address a periodic, reasonable approach to determine structure effectiveness.

USDI-48 Chapter 4, p 103, Table 4-47, Cumulative Changes in Management Indicator Species (MIS) Habitat Capability: According to this table all MIS species are currently experiencing a decrease in habitat capability and this downward trend is expected to continue. The Final EIS should, we suggest, identify how the Forest Service will comply with the National Forest Management Act to maintain well-distributed viable wildlife populations.

USDI-49 Chapter 4, p 105, Stand Level Mitigation, 2nd paragraph: "Measures include clearcutting with reserve trees or partial cutting." Although reserve trees or partial cutting may benefit some edge-related wildlife species, it is not clear how these methods actually minimize impact to the old-growth dependent species if old-growth mature forest is removed. We suggest this be addressed in the Final EIS.

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USDI-32 (cont.) The Federal Budget process requires that the Forest Service submit its budget request, including such projects as project-specific monitoring, to the Office of Management and Budget for review, which then makes recommendations to the President of the United States. The President then submits his budget to Congress for further consideration. Only when Congress passes and the President approves the budget is the Forest Service authorized to obligate funds for programs such as monitoring of the Control Lake project. We operate only within the obligation authority of this process. If funding for this project is not authorized, the Forest Service has no ability to conduct this monitoring.

USDI-33 A full description of fieldwork sampling methodologies is included in the Control Lake Wildlife Resource Report. This level of detail is not appropriate for inclusion in an EIS. A copy of the resource report and unit data forms can be obtained from the Ketchikan Area Office.

USDI-34 The habitat capability models are used on a comparative basis, not as predictors of actual population numbers. For this reason, we believe that the data provided is sufficient for this analysis.

The 1997 TLMP Revision discontinued use of habitat capability models, with the exception of a modified deer model. The modified deer model has been analyzed for the Control Lake Project, and the results are presented in the SDEIS. For other species, the TLMP planning team prepared species assessments documenting expected effects of implementation of the proposed revised Forest Plan. Although the assessments were prepared on a Forest-wide, rather than project-specific basis, they predict effects that are consistent with those described in this EIS for the Control Lake Project.

USDI-35 We have adjusted the maps in Chapter 1 of the SDEIS to improve their readability.

USDI-36 This has been corrected in the SDEIS.

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USDI-50 Chapter 4, p 107, Monitoring, last paragraph: "...preparation of a brief report by wildlife resource specialist...." The FWS would like to receive copies of these reports. Please send to: U.S. Fish and Wildlife Service, Ecological Services, 624 Mill Street, Ketchikan, AK, 99901.

USDI-51 Chapter 4, p 114, Franklin's Grouse: "...this species is considered to be fairly common...." It is the FWS's understanding that the Franklin's spruce grouse is fairly uncommon in Southeast Alaska and is not known to be widely distributed on Prince of Wales Island. We suggest this statement be revised in the Final EIS.

USDI-52 Chapter 4, p 116, 1st paragraph: "Mitigation measures for humpbacks...." We suggest additional mitigation include removal of solid waste materials (i.e., cables) deposited in or around LTF sites that can entangle marine mammals and other wildlife.

We appreciate the opportunity to review and comment on the Control Lake Timber Sale Draft EIS. If you need clarification of these comments, or have questions, please contact Vicki Davis of the Fish and Wildlife Service (907) 225-9691.

Sincerely,

Regional Environmental Officer - Alaska

Enclosure

Responses to U.S. Department of Interior

USDI-37 Chapter 2 presents a summary and comparison of the effects of the alternatives. As such, we believe it is inappropriate to add this additional detail here. The original size of the second largest old-growth patch in the project area (6,598 acres in 1996) can be found in the Biodiversity section of Chapter 4.

USDI-38 Refer to response to USDI-32. Your comments are welcome regarding potential monitoring efforts. As noted in SEAC-40, the Forest Service works cooperatively with the Department of Environmental Conservation regarding the monitoring of BMP's. Forest Service planning efforts frequently rely on input from interagency committees (e.g., Interagency Viable Population Committee).

USDI-39 Descriptions of relevant mineral activities are incorporated into the SDEIS.

USDI-40 The shaded area has been deleted in the SDEIS.

USDI-41 This has been corrected in the SDEIS.

USDI-42 They are included in the project files.

USDI-43 The text refers to the total of current and past old-growth forest, 2,131 acres existing plus 118 acres previously harvested, which equals 2,249 acres.

USDI-44 Refer to response to USDI-39.

USDI-45 We disagree with your assessment. The temperature sensitivity section under Mitigation on pages 4-51 and 4-52 of the DEIS specifically evaluated a variety of parameters to screen temperature sensitivity.

USDI-46 Comment noted.

USDI-47 This statement does not say or imply that nothing will be done to evaluate the effectiveness of retaining structure for 100+ years. It

Comments of U.S. Department of Interior

LITERATURE CITED

Bowyer, R.T., D.K. Person, R.G. White, and T. DeLaca. 1994. A proposal to complete a population viability analysis on the Alexander Archipelago wolf. Appendix III in: L. Suring (chair), Response to the peer review of: A proposed strategy for maintaining well distributed, viable populations of wildlife associated with old-growth forests in southeast Alaska, report of an interagency committee. 22pp.

Kiester, A.R. and C. Eckhardt. 1994. Review of wildlife management and conservation biology on the Tongass National Forest: A synthesis with recommendations. Pac. NW Research Station, Corvallis, OR. 281pp.

Mech, L.D. 1989. Wolf population survival in an area of high road density. Am. Midl. Naturalist 121:387-389.

Sidle, W.B. 1985. Habitat management for forest birds in Southeast Alaska. Wildlife and Fisheries Management Notes. USDA Forest Service. Alaska Region Administration Document 146. Juneau, Alaska.

Responses to U.S. Department of Interior

merely says that the effects are likely to be most evident near the end of the rotation. In fact, the Control Lake project includes a project-specific monitoring activity regarding the implementation and effectiveness of structure retention in harvest units (see Chapter 2). Reports on this study are scheduled for year 1, year 5, and year 10 after harvest.

USDI-48 Chapter 3, Biodiversity section, of the EIS addresses how the Control Lake Project Area will contribute to the maintenance of viable populations of wildlife. In addition, the 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining well-distributed, viable populations of wildlife species on the Tongass.

USDI-49 The purpose of the reserve tree and partial cut prescription is to retain structure within harvest units. Retained trees, over time, may contribute to habitat characteristics by becoming overstory dominants, snags, or by contributing to multi-layer canopy structure. It is expected the retention of structure will allow a second-growth stand to provide specific old-growth stand attributes, and support old-growth dependent species, at an earlier age than a stand in which no structure is retained.

USDI-50 Monitoring reports documenting project-specific monitoring will be completed after implementation of the Control Lake Sale, and will be available by contacting the Ketchikan Area Office.

USDI-51 The entire quote states: "..as noted in Chapter 3, the species is considered to be fairly common in the Project Area" (underlines added). If, as suggested, the reader refers to Chapter 3, it will be noted that the Franklin's grouse is considered to be fairly common in the Control Lake project area based on the frequency of observations by local Forest Service wildlife biologists. Therefore, the statement has not been changed in the SDEIS.

USDI-52 No new LTF sites are planned as part of the Control Lake project. The suggested mitigation measure would apply to the closure of existing sites and would be appropriate as part of the permitting of these sites which is an action that is separate from the Control Lake project.

Comments of U.S. Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

FEB 05 1996

REPLY TO
ATTN OF: WD-126

REF: 95-097-AFS

David Arrasmith
IDT Planning Staff Officer
Ketchikan Area
Tongass National Forest
Federal Building
Ketchikan, Alaska 99901

Dear Mr. Arrasmith:

In accordance with our responsibilities under the National Environmental Policy Act and §309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (draft EIS) for the proposed **Control Lake Timber Sale**. The draft EIS analyzes four action alternatives to harvest between 130 and 233 million board feet of timber from about 7,000 acres on Prince of Wales Island, northwest of Ketchikan, Alaska. The draft EIS does not identify a preferred alternative.

Based on our review, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*.

Our primary concerns, which are related to the potential impacts of the project on water quality and the marine environment, are highlighted below.

EPA-1 1) The draft EIS does not address the direct environmental impacts associated with the proposed use of four existing log transfer facilities (LTFs) for each of the project alternatives. The final EIS should include a discussion of the existing conditions at the LTFs proposed for use in the project alternatives, as well as an evaluation of environmental consequences associated with the use of those LTFs. We have recommendations (see attachment) related specifically to the proposed use of the LTF at Thorne Bay (an "impaired" water body identified on the 1994 303(d) list for the State of Alaska).

EPA-2 2) The draft EIS presents no information to support the assumption that the implementation of best management practices (BMPs) will ensure that the Alaska Water Quality Standards (WQS) will be met. Water quality monitoring is required to demonstrate whether BMPs are adequate to ensure compliance with WQS. Additional information is needed on past effectiveness monitoring efforts related to timber harvest and road construction activities to judge the adequacy of the BMPs proposed for use.

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Responses to U.S. Environmental Protection Agency

EPA-1 As noted in the DEIS, all four of the LTF's proposed for use in the Project Area are existing and permitted. They were constructed prior to the development of the Alaska Timber Task Force guidelines and the issuing of NPDES permits for individual LTF's. See response to USDI-15.

EPA-2 As noted in the DEIS (page 4-52), the Memorandum of Understanding between the Alaska Department of Environmental Conservation and the Forest Service Alaska Region (USDA Forest Service 1992e) is the basis for maintenance of water quality and beneficial uses on the Project Area. Forest-wide monitoring, including BMP effectiveness, is part of the Tongass National Forest Monitoring Strategy. The EIS also evaluates the extensive literature on the effects of timber harvest and road building and incorporates the results of these studies in the evaluation. Additionally, the Control Lake EIS incorporates by reference numerous studies that indicate under what conditions BMP's are effective (e.g., McDonald [or EPA], 1991; EPA, 1993; and Binkley and Brown 1993).

Comments of U.S. Environmental Protection Agency

EPA-3

3) The cumulative effects analyses do not address the impacts of the current roadway network on water quality and fish habitat. The final EIS should include an evaluation of proposed and existing roads in the cumulative effects analyses.

Enclosed please find our detailed comments, which elaborate further on these issues as well as other areas of concern we believe need to be addressed in the final EIS. We are interested in working closely with the Forest Service in the resolution of these issues and I encourage you to contact Bill Ryan at (206) 553-8561 at your earliest convenience to discuss our comments and how they might best be addressed.

Thank you for the opportunity to review this draft EIS.

Sincerely,

Richard B. Parkin

Richard B. Parkin, Chief
Geographic Implementation Unit

Enclosure

cc: Jim Ferguson, ADEC
Duane Peterson, NMFS
ADFG

Responses to U.S. Environmental Protection Agency

EPA-3 The existing conditions of the various resources in relationship to all resource effects (e.g., road mileage, riparian zone harvest, timber harvest on High MMI soils) are all presented in the appropriate section in Chapter 3. All these conditions were considered in the effects analysis and relate to evaluation of direct and cumulative effects. In addition, these parameters were evaluated for all watersheds in the Project Area (see Response to SEAC-36).

Comments of U.S. Environmental Protection Agency

Detailed Comments for
Control Lake Timber Sale
Draft Environmental Impact Statement (draft EIS)

EPA-4 **Log Transfer Facilities**

General Comments

The draft EIS does not address potential impacts to the marine environment associated with in-water log transfer and storage. The final EIS should summarize existing state and federal regulations, the Alaska Timber Task Force Guidelines, and appropriate Best Management Practices aimed at minimizing environmental impacts of LTFs.

All proposed action alternatives would utilize the existing four log transfer facilities (Winter Harbor, Coffman Cove, Naukati Bay, and Thorne Bay). The draft EIS does not adequately address the potential site-specific impacts to the marine environment from continued operation of the existing LTFs. This information is needed to support both the Alaska Timber Task Force (ATTF) guidelines and the description of the environmental requirements pursuant to NEPA. These impacts may be significant, and therefore require further evaluation in the final EIS.

EPA-5 The draft EIS fails to evaluate alternatives to in-water log transfer or alternatives to the four proposed log transfer facilities. All proposed action alternatives would utilize the existing four (4) log transfer facilities (LTFs), located at Winter Harbor, Coffman Cove, Naukati Bay, and Thorne Bay.

EPA-6 Potential Impacts to the Marine Environment

The most significant problem associated with water storage of logs appears to be bark loss (Schaumberg, 1973). Schultz and Berg (1976) measured bark accumulations at 32 inactive log transfer facilities in southeast Alaska. They found deposits up to 182 acres, with an average of 1.96 acres per site (excluding the 182-acre site). The adverse impacts of wood waste deposits on the aquatic ecosystem are well-documented, and include smothering of organisms and chemical changes caused by leaching and decomposition of the waste (Buchanan et al, 1976). Deposits over 3 cm deep result in measurable changes in the benthic community. Bark and woody debris decay slowly and may remain for decades (Conlan and Ellis, 1979).

EPA-7 Alaska Timber Task Force Guidelines

The USDA Forest Service has adopted the "Log Transfer Facility Siting, Construction, Operation, and Monitoring/Reporting Guidelines developed by the Alaska Timber Task Force." The ATTF guidelines were developed by private, public, and resource agency personnel to develop management practices to minimize adverse environmental impacts of LTFs. The final EIS should include a discussion on how the continued operation of the existing LTFs located at Winter Harbor, Coffman Cove, Naukati, and Thorne Bay comply with the ATTF guidelines for Construction, Operation, and Monitoring/Reporting. These guidelines should be included to the Appendix.

Responses to U.S. Environmental Protection Agency

EPA-4 As noted in response comment EPA-1, the LTF's proposed for use in the Project Area are existing and permitted. The potential impacts to the marine environment (e.g., bark accumulation, effects on habitat of bottom-dwelling organisms) are noted on page 4-142 of the DEIS. The level of potential impact is addressed in relationship to the estimated timber volume handled by each LTF.

EPA-5 Alternative methods of log transfer are not discussed in the EIS since there are existing permits for the operation of the LTF's.

EPA-6 Comment noted.

EPA-7 See response to EPA-4.

Comments of U.S. Environmental Protection Agency

EPA-7 (cont.)

The draft EIS provides no information on how the continued operation of the existing LTFs would comply with the ATTF Guidelines for Operation. Additional discussions are needed to determine whether the LTFs would be managed for the following:

C5. Solid waste;
C6. Bark accumulation;
C7. Bundle speed;
C8. Surface drainage;
C9. Hydrocarbons;
C10. Onshore log storage;
C11. facility maintenance and reclamation.

In addition, the draft EIS does not indicate how the continued operation of the existing LTFs would comply with the ATTF guidelines for Monitoring/Reporting. The final EIS should present information on how Winter Harbor, Coffman Cove, Naukati Bay, and Thorne Bay LTF sites would be monitored for:

M3. Bark accumulation (M4. Elements of bark accumulation monitoring should include but not be limited to the following:
   a. permanent transects
   b. measurements of areal extent, outer boundary, thickness and percent coverage of bark debris. As mentioned in the Site Specific Information section, the final EIS should provide information on the existing conditions of the LTF sites through underwater dive surveys),

M5 Oil sheen;
M6. Upland discharges.

EPA-8

Existing State and Federal Regulations

In 1983, the EPA determined that the discharge of bark and other woody debris from log transfer into marine waters constitutes a point source discharge, and therefore, requires a National Pollutant Discharge Elimination System (NPDES) permit pursuant to Section 402 of the Clean Water Act (CWA). The NPDES permit is based on state water quality standards and/or effluent standards promulgated by EPA under the CWA. Since there are no effluent standards for LTFs, NPDES permits are based on EPA's best professional judgement. Permit conditions rely on Best Management Practices (BMPs) and monitoring procedures in the ATTF Guidelines.

In addition, the Corps of Engineers regulates construction of log transfer facilities through Section 404 of the CWA. A Section 404 permit is required for the discharge of dredged or fill material into waters of the United States.

The State of Alaska, Department of Environmental Conservation authorizes, in accordance with the Alaska Water Quality Standards (WQS), section 18 AAC 70.033, a Zone of Deposit (ZOD) for accumulation of bark and woody debris on the bottom of marine waters at the LTF Typically, the ZOD may not exceed both one (1) acre of continuous coverage and a thickness of 10 centimeters at any point. The ZOD may include patchy or discontinuous coverage in addition to one (1) acre of continuous coverage. The ZOD must be located on the ocean

Responses to U.S. Environmental Protection Agency

EPA-8

See response to EPA-4. The comment concerning EPA's developing a General Permit is noted.

Comments of U.S. Environmental Protection Agency

EPA-8 (cont.) bottom directly between the log transfer device and the minus-60-foot contour MLLW, including the log bundle rafting area.

The draft EIS indicates that all four LTFs at Winter Harbor, Coffman Cove, Naukati Bay, and Thorne Bay for the Project Area are existing and permitted (Page 4-141). However, the draft EIS does not indicate what type of permit was authorized for the LTFs. The final EIS should clearly indicate the type of permit and/or authorizations received, to date.

The EPA is currently developing a general permit (GP) for the authorization to discharge under the NPDES for LTFs in Alaska. After the GP is issued, all new and existing LTFs, including those constructed prior to October 22, 1985, will be required to submit a notice of intent (NOI) to be covered under the NPDES GP. The NOI will require dive reports documenting existing bark deposits and biological resources.

EPA-9 Best Management Practices

The achievement of Water Quality Standards from point and non-point source activities may occur through the implementation of Best Management Practices (BMPs) designed to protect beneficial uses. The final EIS should provide a description of BMPs to minimize the discharge of bark, woody debris, and other pollutants from the existing LTFs. In addition, BMPs should be developed to control surface drainage, hydrocarbons, onshore log storage, log rafting, log bundling, etc. These BMPs could include the guidelines set forth by the Alaska Timber Task Force.

EPA-10 Site-specific Comments

The draft EIS provides very little site-specific information for each of the four existing LTFs. This lack of disclosure is inconsistent with the provisions of the NEPA and with other EIS documents produced by the U.S. Forest Service. For instance, the North Revilla EIS, a total of 13 potential LTFs were evaluated. The appendix included site plans and preliminary biological assessments were presented in for all alternatives; underwater dives were conducted for the preferred sites. As the EPA noted in our review of the North Revilla draft EIS, "these efforts to share information during the planning phase of the project provide an important key to resolving conflicts."

EPA-11 An underwater dive survey should be conducted at each of the four sites to (1) evaluate the biological resources, (2) delineate the areal extent and outer boundary of bark accumulation, and (3) estimate the thickness and percent cover of bark debris. This underwater survey would allow our agency and the public to evaluate whether accumulation of bark from the continued operation of the Winter Harbor, Coffman Cove, Naukati Bay, and Thorne Bay LTF sites may result in an direct and/or cumulative impact to the marine environment. The draft EIS fails to evaluate any alternatives to in-water log transfer or alternative log transfer sites.

EPA-12 Furthermore, the final EIS should include the following descriptive information:

1) Location of the existing LTF sites at Winter Harbor, Coffman Cove, Naukati Bay, and Thorne Bay on the Control Lake Project Area maps;

Responses to U.S. Environmental Protection Agency

EPA-9 See response to EPA-4.

EPA-10 No new LTF's are proposed for the Control Lake EIS. See response to EPA-4. The 13 LTF's in North Revilla were for new sites or sites that were not under current permits.

EPA-11 See response to EPA-4.

EPA-12 The LTF locations are all located outside the Control Lake Project Area. Thorne Bay is shown on Figure 1-1. The locations of the other three sites have been added to the same figure. Details on the specific handling of logs is not included since these are existing facilities. As noted in EPA-4, these LTF's are existing and permitted.

Comments of U.S. Environmental Protection Agency

EPA-12 (cont.)

2) Description of the existing LTFs, including transfer devices (e.g., cranes, low-angle slide, A-frames (single or double with a mechanism for controlling speed), log slides, log bundle conveyors, drive down ramps, etc.) and sorting and storage areas;

3) Past estimate of timber volume (MMBF) handled by the existing LTFs.

EPA-13

Thorne Bay

Construction of an LTF at Thorne Bay was originally permitted by the U.S. Army Corps of Engineers in 1980 (Thorne Bay 14). As early as 1974, the U.S. Forest Service reported bark deposits up to 3 feet deep and extending over 200 feet from the face of the LTF (Pease, 1974) Monitoring reports from the log storage permit (Clarence Strait 53) indicate up to 55 acres of bark deposits may exist within the bay. Chronic water quality problems have been documented at the site for hydrogen sulfide

The Alaska Department of Environmental Conservation (ADEC) has identified Thorne Bay (10101-602) as an "impaired water body" on their 303(d) list due to water quality impacts associated with debris and hydrogen sulfide. The EPA has approved the listing of Thorne Bay. A major source of the debris and hydrogen sulfide is the log transfer facility.

Clean Water Act Section 303(d) requires each State to identify those water bodies for which the effluent limitations are not stringent enough to provide for the attainment and maintenance of the state water quality standards. The 303(d) process consists of

1) Identifying waters where required pollution controls are not expected to attain or maintain water quality standards;

2) Setting priorities and targeting resources for development of additional pollutant controls; and

3) Establishing Total Maximum Daily Loads (TMDLs) for use in developing controls for point and nonpoint source pollutants.

In addition, the TMDLs are established for water bodies listed as "impaired" based on priorities established in the 303(d) process. TMDLs establish allowable, quantified pollutant inputs from various sources based on total specific pollutant input or load that the water body can withstand, and still meet water quality standards. A TMDL has not yet been developed for Thorne Bay and, as a consequence, the daily wasteload allocation for the Thorne Bay LTF is not known. Therefore, it is extremely important to minimize the total daily and cumulative input or load of woody debris from the continued operation of the LTF.

Because Thorne Bay has been listed as an impaired water body, EPA strongly recommends that the Forest Service consider the following three options when considering the operation of the LTF at Thorne Bay:

1) Provide data in the EIS that demonstrate that Thorne Bay is not impaired and does not belong on the 303(d) list

Responses to U.S. Environmental Protection Agency

EPA-13 The inclusion of Thorne Bay on the 303(d) list is noted and has been added to the EIS. Responsibility for the operation of this LTF, including water quality standards, rests with Ketchikan Pulp Company.

Comments of U.S. Environmental Protection Agency

EPA-13 (cont.)

2) Show in the EIS that the proposed activity or project is part of a larger plan to bring the water body into compliance with WQS.

3) Modify the proposed action so that it will result in a net decrease (or no net increase) in the pollutant loading for the pollutants of concern (in this case, debris and hydrogen sulfide).

Strict compliance with the Operations and Monitoring Guidelines of the ATTF may prevent further degradation of the water quality and marine environment of Thorne Bay. However, because no information is presented in the EIS related to how the LTF at Thorne Bay is proposed be operated for this project, we are unable determine if that would ultimately be the case. The final EIS should describe measures and plans to ensure that the additional inputs of woody debris from the continued operation of the LTF can meet the Alaska Water Quality Standards.

The EPA supports an alternative to log transfer which would minimize the direct, indirect, and cumulative impacts to the marine environment. The draft EIS indicates that "during the transfer of logs from land to water, bark would be sloughed off and could be deposited on the ocean bottom; bark also is continually sloughed off by agitation by wind and waves while logs are in rafts (Page 4-142)." Therefore, other alternatives which do not require the transfer of logs from land to water should be seriously considered The direct land to barge transfer of logs would minimize the discharge and accumulation of woody debris Activities which do not require the discharge of bark and other woody debris into the marine environment represent the least damaging alternative

EPA-14

Winter Harbor, Coffman Cove, and Naukati Bay

The EPA is not aware of any monitoring information available for these proposed LTF sites As noted earlier, an underwater dive survey is necessary to evaluate existing bark deposits and potential impacts to biological resources

EPA-15

Monitoring

The text indicates that a Monitoring Strategy for the Ketchikan Area was adopted in early 1994 to guide area monitoring efforts (page 2-43). Unfortunately, the EIS does not identify elements of the strategy that will either be conducted within the Control Lake project area or would provide information that is/would be useful in evaluating the effectiveness of Best Management Practices (BMPs) in protecting water quality and fish habitat. We believe that it is absolutely critical that the EIS report findings from past effectiveness monitoring efforts to support the conclusion that the application of Tongass Timber Reform Act (TTRA)-defined 100 foot minimum buffers to Class I and Class II streams and other BMPs will be effective in protecting beneficial uses and meeting state Water Quality Standards (WQS). Similarly, the EIS should provide information indicating that the proposed practices to be employed in headwater areas will provide sufficient protection of water quality and fish habitat. Without this information, the claim of "insignificant impact" lacks a supporting technical basis. Given the lack of information related to effectiveness monitoring on the Tongass in the EIS, we are also concerned with the relatively modest monitoring effort being proposed for the project area and the level of

Responses to U.S. Environmental Protection Agency

EPA-14 See response to EPA-4.

EPA-15 The Tongass National Forest Monitoring Strategy does not try to monitor each BMP's effectiveness in each Project Area. Implementation, effectiveness, and validation monitoring are performed at the Forest Plan level. Specific protocols are being developed for the water quality effectiveness monitor question in the Forest Plan by an interagency group which includes the EPA.

Individual projects are monitored for implementation and for effectiveness and validation monitoring only when they provide a unique opportunity. These opportunities are discussed in the Project-Specific Monitoring section at the end of Chapter 2. With regards to headwaters protection see response to SEAC-26 and SEAC-36. With regards to monitoring see response to SEAC-40. With regards to AFHA effectiveness see response to SEAC-26. The useful document is considered and referenced in the Control Lake EIS. The feedback mechanism is discussed in the monitoring section of the EIS (e.g., Figure 2-6) and in the National Monitoring and Evaluation Strategy (USDA Forest Service 1993a) to which the EIS tiers.

Comments of U.S. Environmental Protection Agency

EPA-15 (cont.)

detail of that proposal. Monitoring is particularly important for a project of this magnitude, because it provides a check on the predictions of effects for the action alternatives. It is important to evaluate the effectiveness of planned mitigation measures in protecting resources potentially affected by future timber sales.

We are aware of a number of effectiveness monitoring efforts on the Tongass that have been initiated in the last several years (see *Report to Congress - Anadromous Fish Habitat Assessment (AFHA), January 1995, Appendix D* and *Tongass National Forest Annual Monitoring and Evaluation Report, Fiscal Year 1994, March 1995, R10-MB-286*) and recommend that any results currently available from these studies be obtained, discussed in the final EIS, and integrated into the planning for this proposed timber sale.

In the event that results from the studies identified in the reports cited above are not available, inconclusive, or indicate that changes to BMPs may be necessary, we recommend that a monitoring plan be developed which includes the types of surveys to be conducted, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups. *Monitoring Guidelines to Evaluate Effects of Forestry Activities on Streams in the Pacific Northwest and Alaska*, EPA/910/9-91-001, May 1991, is a useful document for developing an effective water quality monitoring plan.

The final EIS needs to include a feedback mechanism which relies upon monitoring (including quantitative measurements) so that standards and guidelines, BMPs, standard operation procedures, intensity of monitoring, and timber sale administration can be adjusted when effectiveness monitoring indicates a need. Providing such a process for adjustment will ensure that mitigation measures will improve in the future and that unforeseen project-related effects are recognized and corrective actions can be taken.

EPA-16

Cumulative Impacts

In the evaluation of cumulative effects, the draft EIS does not address the contributions of existing roads on water quality within the project area. The construction and use of roads contribute significantly to sediment loading to streams and impact fish habitat. The final EIS should include revised cumulative effects analyses that address the impacts of existing roads, roads proposed with each project alternative, and any roads that may be developed subsequent to or independent of the proposed sale.

EPA-17

Purpose and Need

It is difficult to determine why a timber harvest volume of 187 million board-feet (MMBF) is explicitly identified in the purpose and need section of the draft environmental impact statement (EIS). While we understand the purpose and need for the project is 1) to satisfy elements of the KPC contract and 2) to move toward the desired future condition of the forest as identified in the Tongass Land Management Plan (TLMP), the EIS does not explain why the harvest volume associated with this particular sale is necessary to meet those needs.

Responses to U.S. Environmental Protection Agency

EPA-16 See response to EPA-3.

Comments of U.S. Environmental Protection Agency

EPA-17 (cont.)

We believe there are issues related to National Environmental Protection Act (NEPA) implementation that arise by explicitly specifying a harvest volume in the purpose and need section of the draft EIS. For example, in stating that the needed volume from the proposed project is 187 MMBF, we believe that the range of alternatives has been limited to those that would meet the identified volume. We believe that both the KPC contractual obligations and movement toward the desired future condition of the forest can likely be met through a wider array of harvesting options than those identified in the draft EIS (perhaps smaller, dispersed timber sales). Furthermore, in defining a specific volume for this project, we have concerns that critical decisions in the planning process (i.e., determination of the target volume) may have been made without adequate public involvement.

Additionally, we have some concerns that the specification of a target harvest volume in the purpose and need section of the draft EIS may conflict with the Forest Service's stated direction of using "ecosystem management" in their decision-making process. We believe that the approach being taken in this EIS is to manage the ecosystem "around" the desired timber harvest level instead of identifying the elements needed to maintain a healthy ecosystem and evaluating the project alternatives in relation to those needs. We believe that a management approach which is driven by pre-defined harvest levels will not ensure maintenance of a truly healthy ecosystem within (and outside) the project area.

The draft EIS does not provide any information related to the process used in defining the target timber harvest volume, and why it is judged to be "needed." At a minimum, the final EIS should identify the process used in determining the target harvest volume identified in the draft EIS, and how that process relates to the concerns identified above.

EPA-18

Water Quality Standards

A discussion is provided on Alaska WQS in the Chapter 3 of the draft EIS. Timber harvest and road construction will affect water quality. From reviewing the EIS we are unable to determine how the action alternatives will be consistent with the WQS. However, the responsibility is on the Forest Service to demonstrate, in advance, that timber harvest and road construction will not cause beneficial use impairment and cause standards exceedances

The statement on page 4-53 that "BMPs...are presumed to meet Water Quality Standards" appears to be the basis for the numerous statements throughout the EIS that claim definitively that "no measurable effects on fish and water quality are expected" to result from timber harvesting and road construction. These statements imply that WQS will be met if BMPs are implemented. We believe this conclusion is misleading since, as we have indicated above, no information related to the effectiveness of the management practices to be employed has been reported in the EIS.

The achievement of WQS for nonpoint source (NPS) activities is intended to result from the implementation of BMPs. BMPs are to be designed to achieve WQS, which would include applicable water quality criteria (WQS consist of both designated beneficial uses and the criteria necessary to protect the uses, and an antidegradation policy). In other words, the water quality criteria are the measures by which BMPs are judged to achieve water quality protection. In

Responses to U.S. Environmental Protection Agency

EPA-17

Because of the modification of the long-term contract and changes in the direction of Forest Planning since the 1991 TLMP RSDEIS, the purpose and need of the Control Lake project has changed and Chapter 1 of the SDEIS has been modified as a result. Appendix A, which identifies why the Control Lake Project was scheduled at this time, has also been revised in the SDEIS. The range of alternatives analyzed in detail in the SDEIS is now very broad. Also see response to SEAC-7.

EPA-18

The comment quotes the DEIS out of context and thereby imparts a meaning to the DEIS that was not stated or intended. The conclusion of the quoted statement is based on the initial paragraphs of that section (page 4-52 and 4-53) which place the quoted statement in the context of the MOA between the Alaska Department of Environmental Conservation and the Forest Service Alaska Region which includes both implementation and effectiveness monitoring. This monitoring is part of the Tongass National Forest Monitoring Strategy (see response to EPA-15). The comment also ignores the fact that the effectiveness of forest management BMP's has been the target of over 25 years of research which has been used to continuously increase the effectiveness of these BMP's in maintaining water quality. The Control Lake EIS incorporates by reference numerous studies that indicate that BMP's are effective (e.g., McDonald [or EPA], 1991; EPA, 1993; and Binkley and Brown 1993).

Comments of U.S. Environmental Protection Agency

EPA-18 (cont.)

addition, the antidegradation policy explicitly lays out that existing beneficial uses must be fully protected.

Also, BMP implementation does not equal standard compliance. The key issue however, as previously stated, is that findings of effectiveness monitoring efforts on the Tongass National Forest, and in the Ketchikan Area specifically, have not been reported or referenced in this EIS. Consequently, assurances of compliance with WQS are not meaningful with this fundamental link missing. BMPs are assumed to protect water quality, but monitoring must be conducted to determine if that is truly the case. If they are not protective, then the BMPs must be revised.

EPA-19

Antidegradation

EPA believes that the proposed project could potentially exceed WQS so that the fisheries beneficial use will not be fully maintained, thereby violating the federal antidegradation policy. An antidegradation analysis, as specified in the Antidegradation Policy [40 CFR 131.12], should be included in the final EIS. This policy was developed to achieve the goals of the Clean Water Act, which are to restore and maintain the chemical, physical and biological integrity of the nation's waters

The Antidegradation Policy describes three tiers of protection. Briefly:

Tier 1.
No activity is allowable which would partially or completely eliminate any existing beneficial use of a water body, whether or not that use is designated in a state's WQSs. If an activity will cause partial or complete elimination of a beneficial use, it must be avoided or adequate mitigation/preventive measures must be taken to ensure that the existing uses and the water quality to protect those uses will be fully maintained.

Tier 2.
Where the quality of the waters exceed "fishable/swimmable" levels ("high quality waters"), that quality shall be maintained and protected unless the following are completed.

1) a finding that such degradation is necessary to accommodate important economic or social development in the area in which the waters are located.
2) full satisfaction of all intergovernmental coordination and public participation provisions, and
3) assurance that the highest statutory and regulatory requirements and BMPs for pollutant controls are achieved

Please note that this provision is intended to provide relief only in extraordinary circumstances where the economic and social need for the activity clearly outweighs the benefit of maintaining water quality above that required for "fishable/swimmable" water. The burden of demonstration on the party proposing such activity is very high. In any case, the activity shall not preclude the maintenance of a "fishable/swimmable" level of water quality protection.

Tier 3:

Responses to U.S. Environmental Protection Agency

EPA-19 The Control Lake DEIS and SDEIS include antidegradation analyses, as specified in the Antidegradation Policy (40 CFR 131.12).

Comments of U.S. Environmental Protection Agency

EPA-19 (cont.)

Where "high quality waters" constitute outstanding national resources, that water shall be maintained and protected. As with the other tiers, the state determines the "tier" of the water body. If necessary, EPA can provide guidance on determining water quality status.

EPA-20

Federal Consistency Provisions of §319 of the Clean Water Act

The final EIS needs to fully integrate §319 of the Clean Water Act. Existing water quality conditions in the National Environmental Policy Act documents need to reflect and reference the state's water quality assessment. Direct or indirect nonpoint source water quality effects need to be reduced through design and mitigation measures to ensure that the project is consistent with the state's NPS program. The contact for the Alaska Department of Conservation is:

Jim Ferguson
Forestry Services Team Leader
Alaska Department of Environmental Conservation
P.O. Box O
Juneau, Alaska 99811
Phone: (907) 465-5365

EPA-21

Affected Environment and Environmental Consequences

We are concerned with the lack of quantitative information presented in the draft EIS in general, and specifically related to compliance with Alaska Water Quality Standards. This is the case in the assessment of existing conditions as well as in reporting expected impacts associated with the project alternatives. As a result, it is extremely difficult to determine the current state of the ecosystems within the project area (baseline conditions) or the significance of the impacts to those ecosystems for each of the project alternatives. While surrogate indicators are provided throughout the EIS which give some gross indication of the potential to impact water quality in a relative sense (e.g., number of stream crossings, acres of roads and disturbed soils, etc.), there is little information provided that allows the reader to translate these indicators into what conditions presently are or are likely to be in the affected streams in an absolute sense. Because insufficient information exists to indicate whether streams within the project area currently comply with or exceed WQS, it is difficult to determine whether any of the proposed alternatives would pose unacceptable risks to water quality and fish habitat. This points out the critical need for adequate baseline monitoring information as the foundation for the evaluation of potential project-related impacts.

EPA-22

Environmental Effects Outside the Project Area

The draft EIS indicates that the project would "indirectly" affect air and water quality in the vicinity of the KPC mill at Ward Cove and at sawmills on Prince of Wales Island. The EIS states that each of those facilities is responsible for ensuring that emissions impacting air and water quality are within legal limits. While it may be somewhat a matter of semantics, we believe that potential impacts in the vicinity of the KPC mill and other facilities are direct impacts from the proposed timber sale as they are a direct consequence of the proposed action. Furthermore, while we agree that the individual facilities are responsible for meeting permit requirements, we believe that additional discussion of these potential impacts should be included in the EIS to

Responses to U.S. Environmental Protection Agency

EPA-20 See response to EPA-18. The Control Lake project follows the MOA between the Alaska Department of Environmental Conservation and the Forest Service Alaska Region.

EPA-21 Comment noted. Also see responses to SEAC-26 and SEAC-36.

EPA-22 KPC (and others) is responsible for the legal operations of their facilities. Your comment is beyond the scope of this project EIS. If timber is offered for sale from this project, it could go to KPC, Klawock, Metlakatla or various other areas for processing.

Comments of U.S. Environmental Protection Agency

EPA-22 (cont.)

satisfy the implementing regulations for NEPA (40 CFR 1502, section 1502.16). For example, what are the current air and water quality conditions at/near the above mentioned locations and what impacts to those conditions are likely to result from each proposed project alternative? Are there currently permits in place at these facilities? What types of permits? What is the status of those permits? Do any of the areas that would be affected by the proposed timber sale currently exhibit air quality or water quality problems? The EIS should be revised to include a discussion/ evaluation of the direct project-related impacts "outside" of the project area.

EPA-23

Economic and Socioeconomic Analyses

The draft EIS provides insufficient information for the reader to independently determine the annual harvest rates used in defining the purpose and need for the proposed sale. Areas needing expanded discussion in the final EIS are indicated below.

1) The maximum annual rate at which KPC is generally allowed to harvest is 192.5 MMBF, as stipulated under section B0.52 of the KPC long-term contract. Because neither a complete citation of section B0.52 nor a description of how the 192.5 MMBF value was derived is included in the EIS, it is difficult for the reader to understand the basis for the 192.5 MMBF figure.

2) The EIS indicates the KPC's average harvest rate, based on contract records from 1989 through 1994, is 185.4 MMBF per year. As with the definition of the maximum harvest rate, little information is provided to allow the reader to independently determine how the average harvest rate was derived. Is there any trend (upward or downward) associated with KPC harvest levels that are not revealed with the use of an average value? If the purpose of the average is to reflect a trend of the just-completed five-year period, with the next three year total being estimated as a multiple of that five year average, then any trends in actual harvest rates may not be truly reflected in an average value.

3) It is not clear what is meant by the "production requirements of the Purchaser's manufacturing facilities" specified in section B0.62 of the long-term contract. Are KPC's production requirements defined by sawn log market prices, wood chip market prices, pulp and paper market prices, or log storage capacity? Because harvest rates are tied to production requirements, the EIS should provide clarification of how such requirements are determined by KPC. Is the term "production requirements" defined in the KPC contract? Similarly, how do the production requirements relate to KPC's manufacturing facilities? Are "manufacturing facilities" defined as the physical plant, property and equipment (PP&E) and the physical constraints of the PP&E to process specific quantities over a specific period of time? If so, how does this relate to the timber harvest values presented in the EIS? If not, how are "manufacturing facilities" defined for purposes of interpreting section B0.62 of the long-term contract?

We recommend that the EIS be revised to include additional information used to define the harvest rates being used as the basis for the purpose and need for the project, particularly with respect to KPC's production requirements and manufacturing facilities. As presently written, it is difficult to determine how the proposed action relates to the KPC contract harvest volumes discussed in the EIS.

Responses to U.S. Environmental Protection Agency

EPA-23 The issues relating to the volume of timber the Forest Service needs to provide KPC is now irrelevant and beyond the scope of this EIS.

Comments of U.S. Environmental Protection Agency

EPA-24 A discussion of the Economic Efficiency Assessment is described on pages 4-144 through 4-147. While the end result figures are provided, the reader is not provided with sufficient information to determine how the results were derived. For example, logging costs, transportation costs and profit margin are presented on a "per MMBF" basis for each alternative, but the EIS provides no information to describe the basis for those costs. We recommend that the EIS be revised to include the base information and methodologies used in developing the economic efficiency analysis.

EPA-25 It is not clear how or where the risk or probability factor was included in the Public Investment Analysis summarized in Table 4-71. From the discussion presented in the draft EIS, it appears that risk (or a probability factor) was only examined from the supply-side of the analysis, with no recognition of demand-side conditions. We recommend that the EIS be revised to further clarify the risk element of the public investment analysis.

EPA-26 Numerous references are made to the Forest Service's economic IMPLAN model throughout the draft EIS. The Forest Service acknowledges on page 5-155 that while IMPLAN assumes a linear relationship between timber harvest levels and the regional economy, the straight-line assumption "may not hold" in reality. This statement has implications as to the usefulness of the model in predicting the economic effects of this timber sale. Because of the potential for different modeled and actual economic effects, we recommend that the discussion of the use of IMPLAN be expanded to indicate why it is being used (are there others better suited to the task?), and discuss the theoretical and applied strengths and weaknesses of the model and the ramifications for modeled results.

EPA-27 The draft EIS states the "long-term economic impacts may further affect the demographic characteristics of the area, with resultant minor impacts on the local housing market and various community services." We recommend that a discussion of these demographic effects and resultant impacts be expanded in the EIS to provide the reader a clearer understanding of the impacts being referred to in this statement. Questions warranting discussion include the following. What are the demographic characteristics and areas being discussed? What are the resultant impacts and are they positive or negative?

EPA-28 The section entitled "Recreation and Tourism" contains insufficient information to support the conclusions about positive and negative affects on the Region of Influence with respect to recreation and tourism. We recommend that the discussion of impacts on recreation and tourism be expanded in the final EIS to support the conclusions related to economic effects.

References

Schaumberg, F.D. 1973. The influence of log handling on water quality. Report EPA-R2-73-085 (Washington: Environmental Protection Agency, Office of Research and Monitoring). 105 pp.

Schultz, R.D. and R.J. Berg. 1976 Some effects of log dumping on estuaries (Juneau: National Marine Fisheries Service, Environmental Assessment Division). 64 pp

Responses to U.S. Environmental Protection Agency

EPA-24 Documentation for the economic efficiency assessment and other aspects of the economic effects analysis are contained in the SDEIS or referenced to other documents contained in the planning record.

EPA-25 See response to EPA-24.

EPA-26 See response to EPA-24.

EPA-27 The referenced discussion has been expanded in the SDEIS.

EPA-28 We believe the information on recreation and tourism presented in the SDEIS is sufficient to adequately address the effects of the alternatives. This is particularly true now that Alternatives 2 and 7 have been dropped from detailed consideration. The existing level of activity by the recreation/tourism industry is relatively low in the project area and the alternatives analyzed in the SDEIS would result in relatively few, if any, conflicts with important recreation/tourism resources in the project area (e.g., Honker Divide, Thorne River, Elevenmile shoreline, and West Coast Waterway).

Comments of U.S. Environmental Protection Agency

Buchanan, D.V. et al. 1976. Acute toxicities of spruce and hemlock bark extracts to some estuarine organisms in southeastern Alaska. J. Fish. Res. Board Can. 33:1188-1192.

Chang, B.D. and C.D. Levings. 1976. Laboratory experiments on the effects of ocean dumping on benthic invertebrates. I. Choice tests with solid wastes. Fish. Mar. Serv. Res. Dev. Tech. Rep. 637. 65 pp.

Conlan, K.E. and D.V. Ellis. 1979. Effects of wood waste on sand-bed benthos. Mar. Poll. Bull. 10:262-267.

Pease, B.C. 1974. Effect of log dumping and rafting on the marine environment of southeast Alaska. U.S.D.A. Forest Service General Technical Report PNW-22. 58 pp.

Responses to U.S. Environmental Protection Agency

Comments of U.S. Environmental Protection Agency

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

Responses to U.S. Environmental Protection Agency

Comments of U.S. Army Corps of Engineers

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 898
ANCHORAGE, ALASKA 99506-0898

REPLY TO ATTENTION OF:

JAN 17 1996

Regulatory Branch
East Section
9-950979

USDA FOREST SERVICES
KETCHIKAN AREA
RECEIVED
JAN 23 '96
FOREST SUPERVISORS OFFICE

	INIT	ACT	INFO	DATE
FS				
UFS				
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AO				
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IM				
ENG				
CDO				
PL				

Mr. Bradley E. Powell
Ketchikan Area
Tongass National Forest
Federal Building
Ketchikan, Alaska 99901-9999

Ref: Control Lake Environmental Impact Statement

Dear Mr. Powell:

This is in response to the October, 1995, Control Lake Timber Draft Environmental Impact Statement (DEIS), which provides information concerning proposed timber harvest activities and road construction on Prince of Wales Island, near Klawock, Alaska.

Based on information contained in the DEIS, we concur with your determination that wetlands and waters which are under the Corps of Engineers' (Corps) regulatory jurisdiction occur within the project area. The Corps' regulatory authorities that relate to timber harvest operations, are based on two laws. Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403) prohibits the obstruction or alteration of navigable waters of the United States (U.S.) without a permit from the Corps. In addition, Section 404 of the Clean Water Act (33 USC 1344) prohibits the discharge of dredged or fill material into waters of the U.S., including wetlands, without a Department of the Army permit.

ACOE-1

Wetlands are defined as areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands include "muskegs", forested swamps, marshes, bogs, and similar areas. Excluding the no action alternative, the DEIS summary indicates that between 599 to 1,186 acres of wetlands would be directly impacted by the construction or reconstruction of logging roads, which would require from 337 to 580 stream crossings. The logging roads would provide access to upland timber and between 2,562 to 4,734 acres of wetland timber which would be harvested under this proposal.

Responses to U.S Army Corps of Engineers

ACOE-1 Comment noted. Also note that very little of the forested wetlands in the alternatives match your description of wetlands including "forested swamps." How forested wetlands were defined are included in Chapters 3 and 4 of the DEIS and SDEIS.

Comments of U.S. Army Corps of Engineers

ACOE-1 (cont.)

The construction or maintenance of forest roads is exempt from regulation under Section 404 of the Clean Water Act, **where such roads are constructed and maintained in accordance with Best Management Practices (BMPs) listed at 33 CFR 323.4(a)(6)** to assure that flow and circulation patterns and chemical and biological characteristics of waters of the U.S. are not impaired, that the reach of waters of the U.S., including wetlands, is not reduced, and that any adverse effect on the aquatic environment is otherwise minimized. A copy of the mandatory BMPs is enclosed with this letter. Your attention is particularly directed to BMPs (i) through (viii).

ACOE-2

The DEIS indicates that the U.S. Army Corps of Engineers 1987 Wetland Delineation Manual was used to determine a site's wetland status, and that the DeMeo and Loggy (1989) procedure was used to calculate wetland acreage. However, the DEIS does not provide specific information concerning the geographic location of wetlands within the study area, which would be required in order to demonstrate avoidance and minimization of impacts to wetlands as required by the BMPs. In this regard, we would appreciate a copy of the wetland delineation mapping prepared for this project. This mapping would facilitate our review and determination of permit requirements.

ACOE-3

Volume 1, Chapter 4 of the DEIS indicates that the projected road construction impacts to wetlands are based on a 75' disturbed road corridor. Based on the information we have, it is our determination that this design would not meet the BMP requirements (i) and (ii).

ACOE-4

The DEIS also states that culverts and permeable subgrade materials would be required when roads cross wetlands in order to maintain water circulation. The Corps of Engineers and the US Forest Service are jointly evaluating the effect of overlay road construction to wetland hydrology near Wrangell, Alaska. In that regard, we would appreciate copies of any reports or hydrological studies supporting the conclusion that the use of permeable subgrade material avoids restricting the natural movement of water.

ACOE-5

The DEIS indicates that some of the proposed roads would accommodate recreational use, and some would include the construction of recreational parking areas, e.g., road segments 69-81-26.1, 70-81-9, 70-81-3.1, 70-82-3.1, 70-81-13.1, 70-81-23, 70-82-29, 70-83-30, 72-83-34.1, 71-82-15.1, 71-80-24.1, 71-82-25, 72-83-1, and 71-83-33.1. Please be aware that the forest road exemption applies only to roads which would be used solely for normal silvicultural activities, **(after demonstrating compliance with the BMPs)**, such as harvesting of trees. Any roads which would subsequently be used to provide recreational access would not be exempt from 404 requirements. In this regard, those road segments identified as Traffic Service Level C would not meet the BMP requirement that the road be constructed solely for silvicultural activities, and would therefore require Corps of Engineers authorization by issuance of a permit.

Responses to U.S. Army Corps of Engineers

ACOE-2 No wetlands related permits are expected to be applied for as part of this project. The wetlands mapping for this project is the Ketchikan Area Office GIS database.

ACOE-3 As noted in the EIS, this is a maximum disturbance width used so as to provide a worst-case analysis. It is not a design criteria. In particular, the clearing for wetlands is generally much less than for steep side-slopes. Site specific conditions are used when actually constructing roads which minimize road width and effects to streams.

ACOE-4 Comment noted.

ACOE-5 Recreation use of proposed roads would be incidental to ongoing silvicultural activities. The initial construction of roads to provide safe use will fall under the silvicultural exemption under Section 404. Location of turnouts on the single lane roads and the method of closing side roads are examples of being able to provide for future recreational uses. These examples are not in addition to the normal construction of such roads. Future upgrading of the roads for recreation or other non-silvicultural reasons would likely need to consider permitting under Section 404.

Comments of U.S. Army Corps of Engineers

ACOE-6

The Control Lake Project Design Cards reflect that many of the road segments will generate material which requires disposal. Disposal sites in areas subject to Corps jurisdiction are not exempt and would require 404 authorization prior to the disposal activity, or alternatively, disposal in uplands.

ACOE-7

Minimizing impacts to waters of the U.S., including wetlands, should be incorporated into your review and design of alternatives with regard to meeting the BMPs and for those project components which would require individual 404 authorization. Corps permits are issued only for projects which clearly demonstrate compliance with the Clean Water Act Section 404(b)(1) guidelines. Those guidelines state that no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, as long as the alternative does not have other significant adverse environmental consequences. In those cases where the activity associated with a discharge is proposed for a "special aquatic site", such as wetlands, practicable alternatives are presumed to exist unless clearly demonstrated otherwise. It is the applicant's responsibility to rebut that presumption, when appropriate, by providing a detailed and verifiable discussion of alternatives for our consideration. An alternative is considered practicable if it is available and capable of being accomplished after taking into consideration costs, existing technology, and logistics in light of overall project purpose.

We appreciate your request for comments concerning this proposal. We are available for further discussion of our comments. We encourage you to contact us at your earliest convenience in light of your need to proceed with your project plans. Please refer to file number 9-950979 in future correspondence or if you have any questions concerning our requirements. You may contact Mr. Ralph Thompson, our Juneau Regulatory Field Officer, at the Juneau Regulatory Field Office, 8800 Glacier Highway, Suite 106B, Juneau, Alaska, 99801-9999, or by telephone at (907) 790-4490, or by FAX at (907) 790-4499.

Sincerely,

Jeffrey K. Towner
Chief, East Section

Enclosure

Responses to U.S Army Corps of Engineers

ACOE-6 Comment noted. Disposal of fill follows BMP 14.12 which requires that disposal areas be identified prior to road construction. However, they would still be authorized under the silvicultural exemption of Section 404. Therefore, a permit would not be required.

ACOE-7 Comment noted.

Comments of U.S. Army Corps of Engineers

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Responses to U.S. Army Corps of Engineers

Comments of State of Alaska, Department of Environmental Conservation

MEMORANDUM

State of Alaska
Department of Environmental Conservation

TO: Lisa Weissler, Project Analyst
OMB-DGC

DATE: December 21, 1995

FILE NO:

THRU:

TELEPHONE NO: 465-5365

FROM: Jim Ferguson JF7
Team Leader, Forestry Services

SUBJECT: Control Lake DEIS

The Alaska Department of Environmental Conservation (ADEC) has completed a review of the U.S. Forest Service (FS) Control Lake Draft Environmental Impact Statement. We have included ACMP-relevant comments where appropriate. The bulk of our comments are made under the authority of the Clean Water Act, Section 319, and the ADEC/FS Memorandum of Agreement.

The FS proposed action would harvest 187 million board feet of timber on roughly 7000 acres. Our comments are directed primarily at: 1) the cumulative effects of timber harvest and road construction in areas that have been heavily harvested already, 2) the preservation of the Rio Roberts watershed, and 3) specific unit and road comments relevant to water quality.

I. Cumulative Effects

ADEC-1 We do not feel that the FS has met the intent of BMP 12.1, Cumulative Watershed Effects, for several watersheds. The DEIS does not conduct a comprehensive, watershed-specific assessment of potential cumulative effects in watersheds that have experienced high levels of past harvest and road construction. For example, the figures presented on page 4-33 have little meaning if they are not presented on a watershed-specific basis.

ADEC-2 Regarding the information on road construction presented in the DEIS, we agree with the statement presented in the EIS (pg. 4-39) that the number of stream crossings can be used as *"an index to assess the potential for erosion and increased sediment inputs to streams."* The large number of stream crossings proposed in the Steelhead, Logjam, and Shinaku watersheds, combined with the extensive existing road network throughout the rest of the watersheds, presents significant concerns for cumulative impacts to water quality and fish habitat.

Although several methods of cumulative watershed effects (CWE) analysis were used for this EIS, none of them considered the combined effects of both existing and proposed roads. According to the EIS (pg. 4-34), *"three methods are used to evaluate the alternatives and their relative risk of*

Responses to State of Alaska, Department of Environmental Conservation

ADEC-1 Appendix E summarizes watershed assessment efforts used in the Control Lake project. One hundred and sixty-seven watersheds were analyzed in the Soils Resource Report and the Fisheries and Watershed Resource Report. These analyses included riparian conditions, potential for stream temperature increases, reductions in large woody debris recruitment, fish habitat conditions, water quality, sediment erosion (road and surface), mass wasting hazard, sediment delivery potential, and likely road traffic volumes. The 167 watersheds analyzed in the Control Lake Project area were consolidated to varying degrees in the DEIS and SDEIS depending on the type of analysis (e.g., 70 watersheds in Table 3-5 and 30 watersheds in Table 4-8). Watershed evaluations were conducted for all 3rd order drainage basins (regardless of size) that drained to anadromous or resident fish streams. In addition, the analyses performed for the EIS also considered the observations that were made during field work for the entire unit pool, including harvest units that were dropped or deferred (see response to SEAC-26). The level of development that had previously occurred in the various drainage basins in the Project Area was also considered.

ADEC-2 The existing road system was presented in the Affected Environment section of the EIS and was considered as noted in response to ADEC-1. The existing roads were also considered in the quantitative sediment delivery analysis (see Soils Resource Report and the Fisheries and Watershed Resource Report).

Comments of State of Alaska, Department of Environmental Conservation

sediment delivery to streams. First is the acres of new road proposed. Second is the number of proposed road crossings of streams. Third is an evaluation of the specific potential for sediment delivery to streams of all harvest units and roads" (emphasis added). The only mention made of existing roads is the statement on page 4-34 that *"Older roads occur in the Project Area; in these areas ongoing road maintenance is important."*

Consequently, the CWE analysis is flawed in that it does not recognize or consider that the existing road system will be used in conjunction with the proposed roads. Consequently, until an analysis is completed which demonstrates that existing and potential cumulative impacts are not expected to exceed State Water Quality Standards and the FS Region 10 Fish Habitat Objectives, further road construction in these drainages should be avoided or minimized. We are also concerned about the overall level of timber harvest proposed for some watersheds. Specifically:

ADEC-3 1. ADEC is concerned about the cumulative effects on the Shinaku Creek and Steelhead Creek watersheds of past, current, and proposed Sealaska and FS timber harvesting and road construction. In both cases, there has been considerable harvest by Sealaska Corporation in the lower part of the watershed.

ADEC-4 A. This situation is of particular concern in the Steelhead Creek watershed, where significant amounts of riparian and stream-side harvest has occurred. The upper part of the watershed, in FS ownership, already has a considerable amount of road construction and timber harvest. At a minimum, in the absence of a cumulative effects analysis, we suggest that logging should be done by helicopter, except where road access requires minimal road construction. The chief area of concern is the proposal to significantly expand the road network in the upper watershed. Specifically, for the Control Lake Project, nearly 7 miles of additional permanent roads involving approximately 34 stream crossings are proposed to access Units 595-420, 421, 422, 423, 424, 431, and 433. These roads are summarized as follows:

72-82-19.5: 1.7 miles to access Unit 595-431; crosses at least 8 streams, 5 of which are tributary to Steelhead Creek -- one of these crossings will require a 60-inch culvert with 25 feet of fill; the road card states *"Consider helicopter logging to avoid road costs."*

72-82-20: 2.9 miles to access Units 595-420, 423, and 424; crosses at least 13 tributaries to Steelhead Creek, including 4 V-notches, and will require the installation of one bridge and 7 culverts greater than 48 inches in diameter.

72-82-20.1: 1.5 miles to access Units 595-422 and 433; crosses 6 tributaries to Steelhead Creek, 3 of which are Class I streams and 3 that are Class II streams -- these crossings will require the installation of culverts greater than 48 inches in diameter.

72-82-21: .83 mile to access Unit 595-421; crosses at least 7 tributaries to Steelhead Creek.

ADEC-5 The EIS states that *"Watersheds with the highest road acreage have the greatest susceptibility for potential road-related sediment delivery."* This is particularly true for the Steelhead Creek drainage as, according to Table 4-3 (pg. 4-13), under Alternative 9, this watershed has the second highest

Responses to State of Alaska, Department of Environmental Conservation

ADEC-3 The existing level of timber harvest and road building in these drainages was considered.

ADEC-4 As noted in ADEC-1, cumulative effects analysis was conducted on these watersheds. Past logging, roading, and riparian harvest were considered. Your preference for helicopter yarding is noted and will continue to be considered.

Helicopter yarding for unit 595-431 is still being evaluated and has been included as an option in Alternative 10. Access to 595-431 is being considered from the northeast and would eliminate the need for #72-82-195. Helicopter yarding of some or all of the other units mentioned also still represent options. Also, a new road accessing unit 595-431 from the northeast has been found to be feasible and will likely be implemented under Alternatives 11 or 12 to reduce road length and the number of stream crossings.

ADEC-5 Unit and road cards summarize the original field notes taken by field crews. Interdisciplinary team review considered all available information including the original field notes and often included discussions with the individuals who performed the field work. Decisions regarding the logging system to be used are affected by the watershed effects of different systems as well as the economics. Helicopter yarding is almost always more expensive than other yarding systems. Frequently it is substantially more expensive and often makes a unit unfeasible. Your preference for helicopter yarding is noted and will continue to be considered. Also refer to response to ADEC-1.

Comments of State of Alaska, Department of Environmental Conservation

3

acreage of proposed roads of all the watersheds in the project area (Logjam Creek has the highest, and is discussed later). When combined with the relatively extensive existing road network and the substantial amount of previous riparian timber harvesting, these additional roads present significant concerns for cumulative impacts to water quality and fish habitat. This is especially true given the fact that they are proposed to be permanent and, as such, will have a high potential for ditch line and culvert blockage and associated sediment delivery to the streams crossed by the alignments. We understand that these types of problems are already occurring on the existing roads. We therefore recommend that Units 595-420, 421, 422, 423, 424, 431, and 433 yarded by helicopter instead of by conventional cable yarding systems.

ADEC-6 B. The upper part of the two main branches of Shinaku Creek are proposed for considerable road construction and timber harvest. The lower section of the main branch has been extensively harvested by Sealaska. Sealaska is likely to harvest more of the upper watershed as well, in the area that is to be conveyed. ADEC's primary concern is, in the absence of a cumulative effects analysis. reducing the amount of road construction. Therefore, options should be explore to limit road construction, and to use helicopter yarding.

ADEC-7 2. We are also concerned about the cumulative effect of additional FS timber harvest and road construction proposed in the Rio Beaver, Logjam. and Goose/Rush Creek watersheds. Again, we do not feel that the intent of BMP 12.1 has been met for these watersheds.

ADEC-8 A. Rio Beaver has experienced high levels of past timber harvest and road construction. A study conducted this past summer (by Ted Geier, Rick Woodsmith and others) showed that this watershed has significantly lower quality fish habitat characteristics when compared to the adjacent, unharvested watershed, Rio Roberts. Also, ADEC has been told that a restoration project is planned for the watershed. Therefore, we are concerned about the impacts from additional harvest and, particularly, from additional road construction. At a minimum, new road construction should be minimized, and helicopter yarding employed as much as possible.

ADEC-9 B. Rush/Goose Creek has not been as heavily harvested and roaded as Rio Beaver, but, given the amount of both, a cumulative effects analysis is warranted.

ADEC-10 C. With the exception of the upper portion within the Control Lake Project area, the Logjam Creek watershed has been extensively roaded and harvested throughout most of its length. All of the action alternatives considered for the Control Lake Timber Sale propose substantial amounts of new road construction within the, as yet, unimpacted upper watershed to access 20 to 24 units in VCUs 577 and 574.

According to Table 4-3 (pg. 4-13), under Alternatives 8 and 9, the Logjam Creek drainage (VCU 577) has the highest acreage of proposed roads of all the watersheds in the project area. In addition,

Responses to State of Alaska, Department of Environmental Conservation

ADEC-6 See responses to ADEC-1 and ADEC-5.

ADEC-7 See response to ADEC-1.

ADEC-8 Under the 1997 TLMP Revision, further long term protection will be given to both Rio Roberts and Rio Beaver watersheds. Old-Growth Habitat LUD's have been established in both watersheds which will limit future harvesting and road construction (see Figure 1-5 and the large map accompanying this SDEIS). Also see response to ADEC-1 and ADEC-5.

ADEC-9 See response to ADEC-1.

ADEC-10 Please note that Alternative 10 does not include roads within the Upper Logjam Creek watershed. Alternatives 11 and 12 also have very limited roading. None of the alternatives require roading in the upper watershed. The 1997 TLMP Revision identifies an Old-Growth Habitat Area covering much of the Logjam Creek watershed.

Comments of State of Alaska, Department of Environmental Conservation

it is identified as one of four subwatersheds with a higher risk of road sediment delivery under all alternatives (pg. 4-39), with road erosion hazard ratings of moderate to high (Appendix D4). This is based on the miles of road and the large number of stream crossings that will be required. Considering only Alternative 9, which plans the least amount of road construction within this watershed, a total of approximately 11.2 miles of new roads are proposed which will involve at least 40 stream crossings, consisting of 5 Class I streams, 12 Class II streams, and 23 Class III streams.

ADEC-11 ADEC recommends that, in the absence of a cumulative effects analysis, no new road construction should occur within the upper Logjam Creek watershed. This includes the construction of Roads # 70-81-16, 70-81-16.1, 70-81-23, 70-81-24.1, 70-81-25, and their associated spurs. Helicopter yarding should be evaluated as an option.

ADEC-12 II. Rio Roberts Watershed

ADEC supports preserving the Rio Roberts watershed as a Reserve Watershed and, therefore, opposes timber harvest and road construction within the watershed boundaries. In the EIS, the Forest Service discusses this issue, calling Rio Roberts an "unofficial" control watershed. The Ketchikan Area should be aware that the Forest Service is "officially" identifying Reserve Watersheds nation-wide. Reserve Watersheds serve as controls for monitoring, research, and restoration projects, and represent a reference or pristine condition for determining changes to watersheds that undergo land-disturbing activities. Rio Roberts is an excellent candidate for such status, and has served as a reference watershed in the past.

Unquestionably, monitoring, research, and restoration projects will be conducted on Prince of Wales Island in the future, implying that Reserve Watersheds will be required. There are very few unharvested watersheds like Rio Roberts north of Chomly Sound on Prince of Wales Island. Most unharvested watersheds are lake/stream systems, which are not typical of most riparian systems on the island (e.g. Karta, upper Thorne, Sarkar). This uniqueness makes the preservation of Rio Roberts especially important.

Also, note that the Rio Roberts research natural area (RNA) proposed in the TLMP revision is not sufficient to serve as reference watershed, as it encompasses only the lowest part of the watershed. The RNA was proposed on the basis of the vegetation present in the area, and not for the pristine watershed conditions that exist in Rio Roberts.

ADEC-13 III. Monitoring

I. This project's monitoring plan does not make a tie to the Ketchikan Area effectiveness monitoring strategy. It should be possible to identify project-area-specific effectiveness monitoring opportunities as part of the project planning process. Further, the Area Strategy can not be fully implemented if opportunities for pre/post-harvest or paired-watershed monitoring are not identified during the project planning process. Such studies can not be initiated after the project is underway.

Responses to State of Alaska, Department of Environmental Conservation

ADEC-11 See responses to ADEC-1, ADEC-5, and ADEC-10.

ADEC-12 Most of the Rio Roberts watershed is in Old-Growth Habitat LUD in the 1997 TLMP Revision, and all alternatives respond to this LUD change.

ADEC-13 The monitoring for this project, as for all Forest Service projects, is tiered to the Tongass National Forest Monitoring Strategy (see response to EPA-15). Project level monitoring was considered as part of the planning process and the appropriate activities are identified in Project Specific Monitoring section of Chapter 2.

Comments of State of Alaska, Department of Environmental Conservation

ADEC-14 2. On page 4-50 and 51: "... In these watersheds it is imperative that BMPs ... be fully implemented to protect water quality and fish habitat." This statement: 1) falls short of a true cumulative effects analysis, and 2) suggests that a special monitoring plan is needed. Are those watersheds targeted for comprehensive BMP implementation and effectiveness monitoring, based on this concern?

3. ADEC is disturbed by the above statement, and by statements like (on page 4-34) "...BMP implementation in these watersheds is especially important." BMP implementation is important *and required* everywhere. DEC is well aware that planning-level BMPs (particularly) are not fully implemented where the need exists to harvest a large amount of timber. However, statements such as this give the impression that this practice is condoned by the Forest Service, when in fact, BMPs should be implemented everywhere.

IV. Unit-Specific Comments

ADEC-15 Class III Stream Buffers

Blowdown of Class III stream buffers presents a significant concern for impacts to water quality and fish habitat within the Control Lake project area. According to the EIS (page 4-77), *"The strongest winds come from the southwest and southeast; therefore, windthrow is most likely to occur in mature stands with uniform and dense crown structures along the north edge of clearcut units."* Although appropriate measures, such as diameter limit selective harvesting, have been prescribed to minimize the potential for blowdown within some Class III stream buffers, these measures have not been consistently prescribed for all Class III streams where blowdown is a concern. According to the unit cards, the following units border or contain Class III streams that have been prescribed for no-harvest slope break buffers which will be susceptible to blowdown:

ADEC-16 575-404: The unit card indicates that blowdown may be a problem; however, a no-harvest slope break buffer has been prescribed for the Class III stream which forms the northern and eastern boundaries of the unit.

ADEC-17 576-427: The unit card states *"One Class III stream in unit (flows into a Class I below unit)"..."Inner gorge of stream shows signs of instability"..."Retain merchantable trees within inner gorge, approximately 50', for root strength"* (i.e., 50' no-harvest slope break buffer). This stream is directly tributary to a Class I low gradient floodplain channel (FP4 - sediment deposition and storage) located immediately downstream.

ADEC-18 577-405: The unit card states *"Moderate to heavy windthrow damage to the hemlock throughout the unit. Windthrow damage possibly due to root rot and shallow soils."* However, a no-harvest slope break buffer has been prescribed for the Class III stream which borders the unit's northeastern boundary. This stream is directly tributary to Class I habitat located a short distance downstream.

ADEC-19 577-409: The unit card states *"Windthrow damage present in areas throughout the unit."* A Class III stream forms the northern boundary of the east half of the unit and has been prescribed for a no-harvest slope break buffer. This Class III reach is located immediately upstream of Class II habitat and is directly tributary to Class I habitat (FP4 channel - sediment deposition and storage) located a short distance downstream.

Responses to State of Alaska, Department of Environmental Conservation

ADEC-14 With regards to cumulative effects analysis, see response to ADEC-1. The cumulative effects and watershed analysis and screening process performed for this project identified these areas as being at higher risk of road sediment input; consequently they deserve a higher level of scrutiny to ensure protection. There is no suggestion that BMP's should not be addressed everywhere; however, because BMP's are considered to be effective, calling attention to these areas seems appropriate.

ADEC-15 Prescribing Type A, B, and C clearcuts as a minimum will serve as diameter limit selective cutting along all Class III streams. These zones of merchantable or unmerchantable trees will form a intermediate zone that will slow windspeeds and minimize the potential for blowdown. Additionally, Class III buffers may be expanded on some units to better meet 1997 TLMP Revision standards and guidelines. Windfirmness will be a primary consideration. Final unit layout will make this determination on a stream by stream basis.

ADEC-16 This unit has a Type C clearcut with small islands of small diameter trees in one setting; Type B in all other settings. These borders will serve to reduce blowdown potential along slope-break buffers. Also, the unit is included only in Alternative 12.

ADEC-17 This unit has a Type B prescription which will serve to reduce blowdown potential along Class III stream buffer; see response to ADEC-15. It is no longer included in the project unit pool.

ADEC-18 This unit has a Type A prescription with low to moderate slopes adjacent to the stream; see response to ADEC-15. It has been dropped from the project unit pool.

ADEC-19 This unit has a Type A prescription which will reduce blowdown potential along the slope break buffer. It has been dropped from the project pool. See response to ADEC-15.

Comments of State of Alaska, Department of Environmental Conservation

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ADEC-20 577-414: A Class III stream forms the northern boundary of this unit and is directly tributary to Class I habitat located a short distance downstream. The unit card states *"Blowdown from southerly winds along this stream may present a problem. Consider moving north boundary to south"* (creating a wind-prone no-harvest slope break buffer on the south side of the stream). The Soils/Geology report states *"Nature of soils may result in high blowdown potential."*

ADEC-21 593-402: The unit card states *"Windthrow damage evident throughout the unit"..."The V-notch along the north boundary is very deeply incised and the inner gorge is unstable - keep north boundary south of the topographic break"* (create a no-harvest slope break buffer on the south [windward] side of this unstable notch).

ADEC-22 593-419: As depicted on the unit card map, the northern boundary of this unit has been laid-out on the south (windward) side of a Class III stream, creating a no-harvest slope break buffer. The unit card states *"Modified boundary by dropping portion above stream located on northwest boundary."* This stream is directly tributary to Class I anadromous fish habitat located a short distance downstream.

ADEC-23 593-422: Two west to east flowing Class III streams occur within this unit and are directly tributary to Class I habitat located just downstream of the eastern unit boundary. One of these bisects the central portion of the unit. According to the unit card, both have been prescribed for no-harvest slope break buffers.

ADEC-24 594-413: A Class III stream forms the northern boundary of this unit and is directly tributary to Class II habitat located immediately downstream. The unit card indicates that blowdown is a concern and states *"The stream along the north boundary has experienced a debris flow in the past"..."Keep north unit boundary at least 25' to south"* (i.e., retain a 25' no-harvest slope break buffer on the north side of the unit).

ADEC-25 595-415: An east to west flowing Class III stream bisects the central portion of this unit and is directly tributary to Class I habitat located a short distance downstream. The unit card states *"harvest only to slope break of V-notch"* (retain a no-harvest slope break buffer).

ADEC-26 595-420: A west to east flowing Class III stream bisects the northern portion of this unit and is directly tributary to the Class I low gradient floodplain channel (FP4 - sediment deposition and storage) of Steelhead Creek located downstream of the northeastern unit boundary. The unit card states *"Stream in most north area buffer to slope break in V-notch"* (retain a no-harvest slope break buffer).

ADEC-27 595-431: According to the unit card, *"The unit is dissected by five Class III streams, each of which occupies a V-notch"..."Harvest should only be to the break in slope at the top of the V-notches"* (no-harvest slope break buffers on all five streams).

ADEC-28 596-426: No-harvest slope break buffers are proposed for the Class III stream that forms the northern unit boundary and for the stream which flows through the west central portion of the unit. These streams are directly tributary to Class II habitat and influence the water quality of the Class I habitat located downstream.

Responses to State of Alaska, Department of Environmental Conservation

ADEC-20 Type A prescription; see response to ADEC-15. In addition, the unit card states that larger windfirm non-merchantable trees should be left along the streams bordering the unit to help maintain windfirmness. The unit has been dropped from the project unit pool.

ADEC-21 This unit has a Type B and D prescription; see response to ADEC-15. Additionally, two large areas adjacent to Class III streams were excluded from the unit. The Type B prescription will provide a selective harvest buffer along the edges of all Class III stream buffers.

ADEC-22 This unit had a Type A prescription; see response to ADEC-15. Additionally, the boundary along the eastern portion of the stream on the north is well back from the stream. Note that this unit has been changed to helicopter harvest in the revised unit pool and a Type C prescription will be implemented.

ADEC-23 This unit has a Type E overstory removal prescription which indicates that the entire unit will minimize blowdown in areas adjacent to the unit. It has been dropped from the project unit pool.

ADEC-24 This unit has a Type A prescription; see response to ADEC-15. In addition, there is only a very short section of Class III stream on the north. The unit card has been modified to reflect this concern.

ADEC-25 This unit has a Type B prescription; see response to ADEC-15. Additionally, the unit card does not say harvest to slope break along the stream that bisects the unit. The statement refers to the stream along the northwest border of the unit which will be buffered further by the Type B clearcut prescription.

ADEC-26 Most of the area mentioned has a Type A prescription; see response to ADEC-15. The unit card has been modified to reflect the concern.

ADEC-27 Most of this unit has a prescription of Type B, the remainder is Type A. See response to ADEC-15.

Comments of State of Alaska, Department of Environmental Conservation

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ADEC-29 597.2-445: A no-harvest slope break buffer has been prescribed for the Class III stream which forms the northern boundary of this unit.

ADEC-30 Given their orientation to the prevailing storm winds, these buffers will be highly prone to blowing down into the streams they were designed to protect. Such blowdown can result in substantial and chronic sediment delivery to downstream fish habitat from upturned rootwads and destabilized stream banks and side slopes. Rather than retaining "hard edge" no-cut buffers, these buffers should be selectively harvested to remove the most wind-prone trees (those of larger diameter with high, dense crowns extending above the slope break) while retaining all smaller diameter non-merchantable trees with short, open crowns that are generally most windfirm. This is especially important for the buffers along the Class III streams adjacent to Units 576-427, 577-409, and 595-420, as they are directly tributary to Class I depositional channel types that are highly sensitive to the impacts of sedimentation on spawning habitat. Where selective harvesting can not be done wihout causing unaccepatable amounts of side-slope disturbance, the buffers should be widened to protect streams from excessive windthrow.

V. Road-Specific Comments

ADEC-31 Road Cards

Many of the road cards for this EIS lack specific information or are conceptual in nature. In addition, the proposed locations and stream crossing structures for several roads do not appear to fully comply with the requirements of the Forest Practices Regulations (11 AAC 95). The following are some of the problems noted during our review:

A. Insufficient Information

ADEC-32 1. The road card for Road # 69-82-32 states *"Spur 69-82-32.5 has a 50' wide creek crossing;"* however, this spur is not identified on any map, nor is the classification of the stream and the type of crossing structure indicated. According to the tabular road information in Appendix E, this spur accesses Unit 574-434 and does not cross any V-notches. In addition, no bridges or culverts greater than 48" in diameter are proposed. Given the width of this stream crossing, and the fact that it is apparently upstream of a Class II tributary to Hatchery Creek, it is essential that the state be informed of the type of crossing structure to be used and the classification of the stream so that assurance can be made that impacts to water quality and fish habitat will be minimized during construction through appropriate mitigation. Per **11 AAC 95.220(a)(5)** and **(a)(7)**, this information must be provided for the state to adequately review the Forest Service's consistency determination.

ADEC-33 2. The cards for the following roads did not have maps included with them to indicate where they are and the type of topography and number of streams they will cross: 69-81-26.7, 69-81-26, and 69-81-26.1. Per **11 AAC 95.220(a)(5), (a)(7), (a)(8)**, and **(a)(9)**, this information is required for the state's review of this project.

Responses to State of Alaska, Department of Environmental Conservation

ADEC-28 This unit has a Type A prescription; see response to ADEC-15. Additionally, the unit card indicates that "blowdown is not a problem." This unit is no longer included in the project unit pool.

ADEC-29 This unit has a Type C prescription; see response to ADEC-15.

ADEC-30 See response to ADEC-15. Additionally, the prescription of Type A and B clearcuts provides the "soft" edge that minimizes blowdown in v-notches.

ADEC-31 The level of information shown on the road cards and unit cards is sufficient for a planning level document such as this EIS. The road cards are based on the field reconnaissance performed for the EIS. This information is more than adequate to provide the decision maker with the information needed to make an informed decision on implementation of a given alternative. Final road location and design will be based on more detailed investigation during implementation. Ongoing coordination with the State, especially ADF&G on Title 16 will continue.

ADEC-32 The unit and road cards for the subject road have been clarified. Final road design will be based on more detailed evaluation during implementation.

The subject roads and unit have been deleted from the unit pool for this project and are no longer included in any of the action alternatives.

ADEC-33 Road numbers have been added to the road card maps (69-81). The roads are also shown on the corresponding unit cards.

Comments of State of Alaska, Department of Environmental Conservation

B. Conceptual Roads

ADEC-34 The card for Road # 70-81-16 Seg. 1 states *"The roads are not field verified. The field engineers could not find a good road location. Check this during final layout."* Similarly, the card for Road # 71-79-28 Seg. A, B states *"The location of the main road was changed by the IDT between 592-401 and 592-402 in order to avoid the Primitive Recreation Area. This section has not been field verified, and the engineers think the new location will be difficult but possible."* Similar descriptions for other roads that have not been field verified or are subject to change pending further investigation include those for Roads # 71-82-25.3, 71-82-24.1 & 24.1A, 71-82-24.3 extension, USFS "P" Line accessing Unit 597-406, 71-79-34.2, and 71-79-28. Consequently, these road segments can only be considered conceptual at this time and not yet suitable for a consistency determination.

ADEC-35 Regarding Road # 71-79-28 Seg. A, B, the card indicates that the economics of road construction in this area are *"some of the worst on the project."* It recommends that helicopter yarding be considered *"to avoid the high amount of road construction per unit of wood."* According to the road card, four Class I streams and four Class II streams, including three V-notches, would be crossed by this alignment. Therefore, we also would recommend that helicopter yarding be considered in lieu of road building to minimize the potential for impacts to water quality and fish habitat as a result of stream crossing construction, use and maintenance. Such an alternative would best comply with **11 AAC 95.285(a)(6)** which requires that stream crossings be minimized.

C. Stream Crossing Structures and Road Locations

ADEC-36 1. The Card for Road # 71-82-2 states *"The reasons for the difficult construction are that this road has 7 large creek crossings. Four of them are in 'V' notches. One of the 'V' notches has excessive bedload movement and will need large culverts or possibly a bridge."* (emphasis added) However, according to the road card, no bridges are proposed. **11 AAC 95.300(a)(7)** states **"in deep V-notches or in drainages where a culvert may require substantial fill, a bridge is the preferred crossing structure, if feasible."** Given the documented high bedload movement within this notch, a bridge should be installed rather than a large culvert to more effectively minimize the potential for crossing structure/roadbed failure and associated impacts to water quality.

ADEC-37 2. The card for Road # 72-79-2 indicates that one Class II stream and one V-notch will be crossed by this alignment. According to the map, it appears that the V-notch and the Class II stream are one in the same. The road card characterizes this notch as being *"10' deep and 40' wide."* However, no bridge or culvert greater than 48-inches in diameter is proposed to complete this crossing. Given the large amount of fill that would be required to install the apparently small diameter culvert at this location, a bridge should be constructed instead of the proposed culvert. This would more effectively minimize impacts to water quality and fish habitat and would better comply with **11 AAC 93.300(a)(7)** (see above).

ADEC-38 3. The card for Road # 71-83-26 states *"The bridge and medium construction can be eliminated by hauling out* [roads] *72-83-1 and 71-83-34."* This alternative should be pursued as **11 AAC 95.285(a)(6)** requires that the number of stream crossings be minimized. It would also avoid the potential impacts to water quality and fish habitat that would be associated with the construction and use of a bridge over this portion of Rush Creek.

Responses to State of Alaska, Department of Environmental Conservation

ADEC-34 The information is suitable for planning purposes. Specific road segments needing further reconnaissance prior to implementation are identified if they are included in the selected alternative. We believe the subject road segments can be considered for ACMP consistency at this time. Several have been dropped.

ADEC-35 Helicopter yarding to saltwater was considered and rejected by the ID Team because of economics, safety concerns related to the open water character of this area, and the distances between harvest units. Stream crossings by roads were minimized in accordance with IIAAC 95.285(a)(6). That regulation relates to general standards for road building and is silent on the use of alternate methods of access.

ADEC-36 The road design for this segment is based on the best judgement of the interdisciplinary team based on available reconnaissance information. Your comment will be considered during final layout. Also see response to ADEC-31.

ADEC-37 Field notes call for a 36" culvert. This will be reviewed during final layout. An alternate route that avoids crossing the stream may be available by branching westward further north of this unit (593-417). The road card has been modified to include these points.

ADEC-38 This alternative route has already been incorporated into project design.

Comments of State of Alaska, Department of Environmental Conservation

ADEC-39 4. Road # 72-79-27 crosses two Class I streams to access Unit 593-426. According to the road card, *"The road is long with difficult construction and accesses only one unit ... The economics are poor; consider helicopter logging 593-426."* We also would recommend that helicopter logging be considered to avoid the potential impacts to water quality and anadromous fish habitat associated with the proposed bridge and culvert installations on these two Class I streams. Again, **11 AAC 95.285(a)(6)** requires that stream crossings be minimized. If helicopter yarding is a viable alternative, then it should be employed in lieu of road construction.

ADEC-40 5. According to the unit card map for Unit 576-427, the existing Forest Service 30 Road traverses through the riparian buffer of a Class I stream which it crosses four times within a relatively short distance in the vicinity of Unit 576-427. The location of the 71-83-30 Spur, as proposed, would add a fifth crossing of this stream to access the eastern portion of Unit 576-427. Five crossings throughout a half mile reach of this Class I stream is excessive and, cumulatively, detrimental to water quality and fish habitat. According to the topographic features on the road card map, this area appears to be of relatively gentle relief and, therefore, not limiting to road location. As such, alternative spur alignments must be investigated which do not involve an additional crossing of this anadromous stream. Again, **11 AAC 95.285(a)(6)** requires that stream crossings be minimized. As currently laid-out, the 71-83-30 Spur alignment is inconsistent with this requirement as alternatives appear to exist which avoid crossing this stream altogether.

ADEC-41 6. Road # 70-81-9.A crosses a Class I stream which bisects the central portion of Unit 577-416. However, it appears that this crossing can be easily avoided simply by constructing a separate short spur off Road # 70-81-9 to access the northern portion of the unit from the west. This alternative must be pursued in order to fully comply with **11 AAC 95.285(a)(6)**.

ADEC-42 7. ADEC has observed a number of problems with stream crossings on the 3015 road (Thorne River) and the 3016 road (Honker Divide road). These roads are out of compliance with the Forest Practices Regulations, **11 AAC 95.315** (Road Maintenance), and must be maintained before operations commence.

We appreciate the opportunity to comment.

cc: Mike Conway, ADEC
Lana Shea, ADF&G
Jack Gustafson, ADF&G
Bruce Johnson, ADNR
Wayne Elson, USEPA
Mark Jen, USEPA
Dave Arrasmith, USFS
Larry Lunde, USFS
Ted Geier, USFS
Ann Archie, USFS

Responses to State of Alaska, Department of Environmental Conservation

ADEC-39 Refer to response to ADEC-5. This unit is not currently included in any of the action alternatives considered in detail in the SDEIS.

ADEC-40 Additional alternatives have been investigated for accessing this unit and have been added to the unit card for consideration during final layout.

ADEC-41 The suggested alternative route and another route that moves the road west of the uppermost part of the creek, has been added to the unit card for consideration during final layout.

ADEC-42 These problems have been corrected as part of the Ketchikan Area road maintenance program (Summer 1997).

Comments of City of Craig

CITY OF CRAIG
ALASKA

December 26, 1995

Forest Supervisor
Ketchikan Area
Tongass National Forest
Attention: Control Lake EIS
Federal Building
Ketchikan, AK 99901

Dear Mr. Powell:

At their December 7, 1995 council meeting, the Craig City Council instructed me to respond to the Control Lake EIS by expressing their preference to the proposed alternatives and their concerns with all the alternatives as well.

COC-1

The City of Craig has gone on record as being opposed to any logging activity in the Eleven Mile Area. This means we are opposed to any logging of the VCUs #592 & #593 and are opposed to further logging of VCU#591. This opposition has been formalized in a resolution submitted to your predecessor, Mr. Rittenhouse.

At the same time the council has supported an optimal number of logging and timber related jobs, harvest units in the Control Lake project area for small and independent logging contractors, safe logging practices within the context of sustained yield/multiple use principals and reasonable road access to the public once the harvesting is complete.

Another important consideration has been and continues to be maximization of National Forest Receipts within the spirit of United Sates Code 500 with impacted communities for development and support of roads and schools in these communities.

Based on these criteria, the Craig City Council goes on record as supporting Alternative #7 with the qualification that harvest units be made available to small and independent operators under the Ketchikan Area Independent Timber Sale Program, especially those units located in already roaded areas. We feel this is justifiable because the Control Lake Sale is outside the KPC Contract area and,

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Responses to City of Craig

COC-1 The purpose and need for the Control Lake project has changed since the DEIS was issued. Because of this and because extensive harvest in the Honker Divide area would be inconsistent with the new TLMP, Alternatives 2, 7, 8, and 9 have been eliminated from detailed study in the SDEIS. Of the alternatives being considered in detail, Alternative 11 does not include any road construction within 3 miles of the Elevenmile shoreline and Alternative 10 does not include any road construction within 5 miles.

Comments of City of Craig

COC-1 (cont.) the "purpose and need" justification for this project includes timber availability for small and independent operators.

Alternative #7 does not include entry into the Eleven Mile Area, provides about 350 annual direct jobs and provides a reasonable revenue base to be contributed to the National Forest Receipts program USC500. It is our understanding that the highest stumpage yield per MBF will be realized by sale to small and independent operators. This, to us, is a primary consideration for offering harvest units to small and independent operators.

Alternative #7 also provides a high percentage of partial cut harvest units thereby addressing the sustained yield/multiple use criteria.

COC-2 At public hearings in Craig, residents have frequently objected to closing logging roads to public access after completion of the harvesting. We therefore request that every effort be made to provide public access of the harvested areas. Public access could be by minimizing vehicular access but providing parking, trails and some off-highway vehicle areas. It is our contention that the public should continue to benefit from the use of public funds spent to develop the project by being allowed access for subsistence and recreational purposes.

COC-3 The City of Craig also wishes to remind the Forest Service that we advocate timber harvest volume exchanges such as those proposed on Cleveland Peninsula (not that we endorse that particular proposal, because we do not!). But that approach is acceptable in a time when withdrawals and exclusions have seriously diminished the Tongass Forest harvestable timber base. It is important that all options to maintain a viable timber supply be explored.

We thank you for the opportunity to comment on the Draft EIS for the Control Lake Timber Sale and hope our comments will be implemented in the project development.

Sincerely,

Tom Briggs

Tom Briggs
City Administrator

CC: Mayor
Council members
Congressional Delegation

Responses to City of Craig

COC-2 Comment noted. Site specific road closurees associated with the preferred alternative (Alt. 11) are shown on the large map accompanying this SDEIS. Please provide us with your road-specific comments regarding this road management proposal. Comments of greatest value in this regard are those that identify specific road segments and why you believe they should remain open or closed.

COC-3 Comment noted.

Comments of Alaska Women In Timber

ALASKA WOMEN IN TIMBER

December 22, 1995

Brad Powell
Forest Supervisor
USDA Forest Service-KTN
Federal Building
Ketchikan, AK 99901

Re: Control Lake Draft EIS Comment

Mr. Powell,

AWIT-1 Alaska Women In Timber is a grassroots organization representing 300 plus members in associated timber products industries. I am pleased to have the opportunity to express our full support for the Control Lake Timber Sale.

Our membership is supported by timber industry and economic stability is what our members wish to have for their families.

I strongly urge you to voice our full support for the Control Lake Timber Sale.

Sincerely,

Sandra J. Meske
Vice President AWIT

Responses to Alaska Women In Timber

AWIT-1 Comment noted.

Comments of American Agri-Women

American Agri-Women

December 22, 1995

Brad Powell
Forest Supervisor
USDA Forest Service-KTN
Federal Building
Ketchikan, AK 99901

Re: Control Lake Draft EIS Comment

Mr. Powell,

AAW-1

American Agri Women is a grassroots organization representing 50,000 plus members in associated commodity industries. I am pleased to have the opportunity to express our full support for the Control Lake Timber Sale.

Our membership is supported by the timber industry and economic stability is what our members wish to have for their families.

I strongly urge you to voice our full support for the Control Lake Timber Sale.

Sincerely,

Sandra J. Meske
Timber Commodity Chairman

Alaska Women in Timber
American Angus Auxiliary
American Hereford Auxiliary
American Sheep Industry Women
Arizona Agri-Women
California Women for Agriculture
California Women for Turkeys
California Women in Timber
Colorado State Woolgrowers Auxiliary
Fur Farm Animal Welfare Coalition Ltd
Idaho Women for Agriculture
Idaho Women in Timber
Illinois Agri-Women
Indiana Agri-Women
Iowa Agri-Women
Kansas Agri-Women
Kansas CattleWomen
Kansas Sheep Auxiliary
Lake States Women in Timber
Michigan Peach Sponsors
Minnesota Agri-Women
Missouri Agri-Women
Missouri CattleWomen
Montana Women in Timber
Morning Glory Farms Region
AMPI Women
National Peach Partners
National Shorthorn Lassie Association
Nebraska Agri-Women
New Mexico Woolgrowers Auxiliary
North Dakota Agri-Women
North Dakota CattleWomen
Oklahoma Women for Agriculture
Oregon Women for Agriculture
Oregon Women for Timber
Penn's Agri-Women
Phoenix Cotton Wives
Red River Valley Potato Growers Auxiliary
Salers Belles
Texas Agri-Women
Texas Sheep & Goat Raisers Womens Auxiliary
Texas Women for Agriculture
Washington State Dairy Women
Washington Women for Survival of Agriculture
Wisconsin Women for Agriculture
Women of National Agricultural Aviation Association
Women for Ohio Agriculture
Women for the Survival of Agriculture in Michigan

Responses to American Agri-Women

AAW-1 Comment noted.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

Dec.23, 1995

Bradley Powell
Forest Supervisor
USDA, Forest Service
Federal Building
Ketchikan, AK 99901

Dear Mr. Powell:

Thank you for the opportunity to comment on the proposed Control Lake Timber Sale Draft Environmental Impact Statement (DEIS).

We are offering comments on behalf of Control Lake Citizen's Coalition (CLCC); a diverse group of independent timber operators, Alaska natives, educators, business owners and fishermen.

CLCC-1

Almost all members of the CLCC live on Prince of Wales (POW) Island.

The CLCC developed a citizen's alternative for the Control Lake area based on premise that all members of the community should have a voice in how our forest resources are managed. The citizen's alternative is a synthesis of community voices with compromises made by all interested parties.

The Control Lake area is central to all the communities on Prince of Wales Island. It is of vital importance to all independent loggers who live here and contains the most important subsistence areas on the island.

A major shift in thinking about future prospects for the island is presently occurring among many citizens and community leaders.

Historically, Ketchikan Pulp Co. (KPC) has logged by setting up spike camps filled with imported logging crews. Alaska state labor figures show that 39% of timber industry workers are from out of state. Local residents are beginning to realize that a slower pace of logging will keep local residents working longer.

The level of logging proposed on Prince of Wales Island is making it impossible for KPC to live up to the local hire provisions of it's contract under B0.14.

Island town leaders are recognizing that a viable economic future after the 50-year contract will require a major shift in forest management to provide for:

1. Opportunities for value-added business to develop.
2. Opportunities for small independent loggers to travel to work from their homes instead of from spike logging camps.
3. Opportunities for other tourism, recreation and fishing industries to grow.
4. Enough high quality wood to be available to ensure a

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

CLCC-1 A number of changes have been made that respond to this comment. An SDEIS is being prepared, which includes the CLCC alternative (Alternative 10) in the main text as an alternative analyzed in detail. The project purpose and need has been modified and the range of alternatives under consideration in the main text has been widened. In addition, the KPC contract has been modified and the Control Lake project will not supply timber under the long-term contract. A series of individual timber sales are planned for the Control Lake EIS. For example, Alternative 11 would likely be sold in 17 different sales.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

Powell
Page-2

CLCC-1 (cont.)

diversified woods industry well into the future.

The tired rhetoric by the Forest Service that it is managing by providing sustainability on a forest-wide basis is nothing but a hollow echo to those who live on Prince of Wales island which has by far received the brunt of logging in Southeast Alaska.

CICC believes that the current Forest Service purpose and need for Control Lake area is indefensible and illegal.

When the Control Lake area was originally part of the CPOW timber sale; only 49.7 mmbf was to be made available for this entry period (f.s. working paper 4/18/91). The process that decided the current narrow alternative ranges in this DEIS has not been presented or defended. We recommend that the Forest Service issue a supplemental DEIS that provides alternatives that are in line with the carrying capacity of the land, maintains wildlife habitat, and demonstrates community desires and needs.

In short, the CLCC alternative should be (and should have been) given action status.

A. THE PURPOSE AND NEED OF THE CONTROL LAKE DEIS WAS DRAFTED SOLELY ON THE NEED TO SUPPLY THE KPC CONTRACT.

CLCC-2

Plenty of evidence exists that the Forest Service intends to give none of the timber in the Control Lake timber sale to independent timber operators.

Vol.I Table 4-64 shows all of the timber going to KPC log transfer facilities (LTF) and the reason given for not considering the Klawock LTF was that KPC does not use this facility. See Vol. Chap.4 p.141 Par.3.

Furthermore, the economic analysis contains no bid premium which would indicate the sale of wood to independent operators.

Moreover, Appendix A makes it clear that the DEIS is part of the gate 2 process for supplying timber to KPC. The promise of timber to KPC with the only stipulation that it get through the environmental process without modification of the stated purpose and need is a violation of NEPA and a nullification of the public process.

B. THE CONTROL LAKE DEIS VIOLATES THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA); ANILCA; THE FORREST AND RANGELAND RENEWABLE RESOURCES PLANNING ACT (FRRRPA) AND THE NATIONAL FOREST MANAGEMENT ACT (NFMA).

CLCC-3

It seems clear that the action alternatives presented in this DEIS are designed to maximize profits to KPC.

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

CLCC-2 It is untrue that the Forest Service intended to supply none of the timber from Control Lake to independent timber operators. Appendix A in the SDEIS has been changed to reflect current conditions. Refer to the response to CLCC-1.

LTF's were selected for analysis based on their proximity to project volume. The closest LTF would likely be used in the timber sale appraisal process regardless of who may bid on the sale.

Note also that bid premiums are built into the range of pond log values used in the appraisal process (see response to CLCC-6).

CLCC-3 The action alternatives in the DEIS were not designed to maximize profits to KPC. One indication of this is the amount of non-traditional clearcutting and partial cutting incorporated into the potential harvest units. We disagree that the Control Lake EIS has violated any laws. See Chapter 1 of the SDEIS, which addresses consistency with legal mandates.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

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CLCC-3 (cont.)

The TTRA said that KPC was to get quarterly adjustments in its stumpage rates to bring them in line with prices in the independent sale program.

The elimination of independent sales keeps KPC appraisals low by eliminating the comparable price adjustment under B3.2 and B3.21 of the KPC contract.

CLCC-4

All of the action alternatives enter the Winter Harbor area where high road building costs give a very negative return.

The only reason for entering this area is to build up a lot of road credits for KPC. The timber in this area does not justify the road building and the majority of the residents on this island are against logging this area.

In all of the action alternatives, the amount of road credit exceeds net stumpage values by 11.7 to 18 million dollars regardless of timber volume logged.

Considering the fact that only 30.6 miles of new road would be open to the public and 56 miles of existing road would be closed; the action alternatives in this DEIS represent a net loss of usable road to the public at tremendous expense.

To design 169 miles of specified road in a project that will result in a net loss of roads open to the public indicates that roads are being used to loot the public treasury.

Roads that are only to be used to remove timber should be designated temporary roads and paid for by the logging company.

This loss of usable road to the public is an indication that we have reached the saturation point for all public resources except timber.

Appendix A indicates that one of the reasons for trying to supply the long-term contract from Control Lake is the existing infrastructure and proximity to existing KPC LTFs.

CLCC-5

This structuring of timber sales to maximize KPC profits is a violation of FRRPA Sec.6(g)(3)(E)(iv) which sets guidelines for the forest plan in the preparation of NEPA documents.

This section says the Forest Service must "insure that timber will be harvested from National Forest System lands only where the harvesting system to be used is not selected primarily because it will give the greatest dollar return or the greatest unit output of timber."

Appendix A p.3 par.7 says "Although KPC has indicated that the Forest Service has the discretion to consider obtaining volume from

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

CLCC-4 The unusually high road construction costs for the Winter Harbor resulted from a calculation error. This error has been corrected in the SDEIS. Note that the Elevenmile portion of this area is still relatively expensive.

Specified roads are shown separately in the appraisal process for several reasons. First, by taking the road cost (value) out early in determining the net stumpage, one can get an indication of how saleable an area is in different market conditions. In other words, how likely are we to be able to sell the timber in a given area. Second, the relationships just discussed can be used to determine the need (if any) to apply for road augmentation or pre-roading funds. Third, the specified road values (purchaser credit predictions) are added back into the cash flow values for estimating 25 percent return to the State. Finally, the roads are shown as an asset in TSPIRS calculations.

A permanent road is still an asset for long-term management of National Forest System lands, regardless of whether the road is open or closed to the public. Closing of permanent roads often means deferring heavy maintenance until the next entry. The road prism is still there for that next entry and usually at a cost significantly less than building a new road. See the response to CLCC-9 for more information why roads may be closed.

CLCC-5 Refer to the responses to CLCC-2, CLCC-3, and CLCC-4. Your comments are out of context with the areas cited.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

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CLCC-5 (cont.)

outside the designated sale area, it has not expressed an interest (in) obtaining timber from other areas in lieu of the Control Lake Project Area."

This statement is an indication that KPC, whose motives are completely profit-driven; is directing Forest Service policy toward the Control Lake area.

The next sentence in the DEIS "The criteria for modification in 36 CFR 223,112,113 have not been met, considering the information in the TLMP SDEIS, and this EIS."; is at odds with the official Forest Service position.

In fact, the Forest Service has just finished the draft comment period on the Eight Fathom Bight area on Chichagoff Island which is offering 101 mmbf to either the KPC long-term sale or the independent sale program.

This sale document clearly states that timber provided to KPC on this sale area will count toward the long-term sale contract.

CLCC-6

The CLCC can only conclude the DEIS misrepresents to the public the necessity for the intensive logging proposed for the Control Lake area.

The consequences of this chosen course of action are devastating to the communities on Prince of Wales Island.

For independent operators, Control Lake is the only remaining area of accessible timber that has not been tied up in previous NEPA documents and given to KPC. CLCC believes the almost half a billion bd. ft. of timber given to KPC in the CPOW, Polk, and Lab Bay EIS's is more than enough to provide for KPC dependent communities.

There is no doubt independent operators pay much more for timber. A review of Ketchikan area Forest Service 2400-17 forms for 1994 shows that independent operators paid $407.78 per mbf with road credit and a cash return of $374.28 per mbf. The sale compositions were 24.5% spruce, 52.8% hemlock, 6.75 Alaska yellow cedar, and 15.93% western red cedar.

In addition, independent operators regularly purchase utility cedar which is given free of charge to the pulp company.

The failure of the DEIS to consider the greater return to the government offered by Alternative 10; and the failure of the DEIS to offer any alternative with a positive real return to the U.S. treasury is a violation of NFMA.

CLCC-7

While the Forest Service recognizes it "is required by the

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

CLCC-6 See the response to CLCC-4. Also note that the economic valuation of the alternatives used a higher current value than the value used for the mid market valuation approach. This gave a range of potential sale values that easily account for the bid premiums you refer to.

CLCC-7 We disagree with your conclusions on the economic analysis used in this EIS. See response to CLCC-4, CLCC-5, and CLCC-6.

CLCC-8 There is no reason why independent operators could not use

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

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CLCC-7 (cont.)

NFMA, and Forest Service policy and manual direction to perform economic efficiency and economic equity or distributional analysis as part of NEPA process."; it's omission of Present Net Value (PNV) numbers and the 25% distribution to the state in this analysis leads to the faulty conclusion the DEIS provides a positive return to the U.S. Treasury. See Vol.1 Chapt.4 p.143 par.2 and Fig.4-65.

When the 25% distribution to the state and communities is deducted from PNV, the actual return to the U.S. treasury ranges from -$4.97 for alt. 8 to -$52.04 for alt.9.

These numbers represent the most optimistic forecast of what the Forest Service would receive from the action alternatives. If PNV costs and the 25% distribution to state and communities is deducted from the mid-market net stumpage values (NSV); the return ranges from a -$228.18 for alt. 8 to -$275.34 for alt. 9.

Traditionally, the pulp industry has followed a boom and bust cycle which caused the Forest Service to give KPC a cash rebate in excess of 6 million dollars in 1992 from 1989 prices. It is not unreasonable to conclude the mid-market NSV are the more likely return to the U.S. treasury in this DEIS.

The inevitable conclusion of any economic analysis of this DEIS is that it fails to meet the standard set out in NFMA Sec.14.
(h) which says "The Secretary of Agriculture shall develop utilization standards, methods of measurement, and harvesting practices for the removal of trees, portions of trees, or forest products to provide for optimum practical use of the wood material."

CLCC-8

Indeed, the DEIS makes no allowance for independent operators to even access closed roads for salvage purposes.

Furthermore, the statement found in Appendix A p.4 par.5 that says "designating any part of this volume for the long-term sale could directly reduce the portion of the ASQ available to the independent program."; shows recognition of the destruction of long term timber employment possibilities on POW island.

The action alternatives set forth in the DEIS show complete disregard for timber sale direction set forth in NFMA Sec.14.(g)(1)(C) which says the Forest Service must "consider the economic stability of communities whose economies are dependent on such national forest materials,".

This DEIS fails to show where it has considered the stability of any communities on the west side of POW island. Instead, the DEIS road closure policies substantially limit subsistence and recreation opportunities.

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

closed roads for salvage purposes. The road would be opened for such an entry and likely closed again upon completion of the project. See response to CLCC-4. Also see response to CLCC-1 regarding the status of KPC.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

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CLCC-9 Road closures do not mitigate the effects of logging. They do not prevent excessive predation by bear and wolves or winter kill caused by heavy snows.

The unintended consequence of road closures is to treat local residents as the enemy of the land. This provokes hostility in local citizens resulting in the agency being referred to often as

"communists" and Forest Service policies being seen as the "beginning of the police state."

Rather, road closures are an attempt by the Forest Service to allow excessive logging and an attempt to cover up the consequences.

While the DEIS gives excuses for road closures in specific areas; it fails to reveal the criteria by which it determines which roads should be closed. It is impossible to tell which concerns are real or imagined.

CLCC-10 The failure to consider alternatives that would avoid restrictions on subsistence resources and uses is a violation of Section 810 of ANILCA.

CLCC-11 CLCC subscribes to a simple principle; if the public pays for a road, it should be able to use it. If roads are built for a purpose other than public use; the primary user should pay for them.

As a consequence, we now believe that the Honker road and Cutthroat lakes roads should be reopened and that no other roads should be built in these areas under this EIS.

CLCC-12 CLCC also advocates the building of a recreation trail from unit 578-103 on the Honker road 3016 to Thorne Lake and the opening of 3016300 to provide viewing for the Honker Divide area.

C. THE HONKER DIVIDE AND 11-MILE SUBSISTENCE AREAS DESERVE SPECIAL CONSIDERATION.

1. 11 mile and subsistence

CLCC-13 The residents of Klawock and Craig have long used the 11 mile area for subsistence. It is unconscionable that the Forest Service would enter into this culturally sensitive area to continue its below cost timber sales.

Every one of the action alternatives results in a loss of subsistence opportunities.

The current demand for deer exceeds the long-term habitat capabilities in many areas according to the TLMP revision SDEIS.

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

CLCC-9 The purpose of road closures varies from road to road but generally relates to reducing project effects on wildlife, particularly on the wolf, which is a species that is close to being listed as a federally threatened species. Open road density is widely considered among wolf experts to be inversely related to wolf density. Reduction of long-term maintenance costs is also a factor involved in the decision to close roads. In some areas, road closures are intended to minimize effects on traditional subsistence uses (e.g., in the Elevenmile area) or reduce effects on existing recreation users (e.g., in the vicinity of Honker Divide and along the Thorne River). It is recognized that leaving roads open provides benefits to some recreationists and subsistence users seeking new areas for vehicular access. In deciding whether to close roads or leave them open, all of these factors must be weighed. Comments on specific roads (e.g., CLCC-12) and why you think they should be closed or left open would be helpful in the FEIS.

CLCC-10 This is not a violation of Section 810 of ANILCA. Refer to the response to SEAC-17. Also, note that Alternatives 10, 11, and 12, all relatively low volume alternatives, are being analyzed in detail in the SDEIS and that the no action alternative is an alternative under active consideration.

CLCC-11 Refer to the responses to CLCC-4 and CLCC-9.

CLCC-12 Comment noted. However, the 1997 Forest Plan Revision places further restrictions on roads in this area with the establishment of a large Old-Growth Habitat area covering Honker Divide, Cutthroat Lakes, and adjacent areas.

CLCC-13 All action alternatives in the SDEIS avoid the Honker Divide and Elevenmile areas to varying degrees providing the Forest Supervisor with a wide range of options to consider. Also, refer to the responses to SEAC-18 and SEAC-22.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

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CLCC-13 (cont.)

This document shows that 100% of the old growth on private land in waa 1318 and 62% of old growth on private land in waa 1315 has already been cut.

The pressure put on adjacent federal lands and the additional loss of habitat will only exacerbate the shortage of deer in the
waa's unable to meet current demand.

The Craig area is one of the fastest growing cities in Alaska in terms of hunter numbers and the Control Lake area is one of the most heavily hunted areas in Southeast Alaska for the past eight years.

These factors alone should demonstrate to the Forest Service the importance of maintaining large uncut blocks of timber for wildlife regeneration

2. Honker Divide

CLCC-14

Twenty years ago, former Gov. Jay Hammond recognized the exceptional qualities of the Hatchery Creek-Thorne River drainages and called for a setting aside of this area to promote the outstanding wildlife and recreational opportunities.

In 1974, Alaska Department of Fish and Game proposed to the Forest Service that Honker Divide be given federally designated scenic river recreational status.

Today, Honker Divide remains the biological heart of POW island. The surrounding areas on all sides have been heavily logged and if this island is to bounce back from 40 years of intensive logging; the Honker Divide corridor must be recognized for its important habitat as well as for its recreational attributes.

D. Summary

CLCC-15

Finally the CLCC believes that all the action alternatives were designed to maximize KPC profits.

CLCC-16

The DEIS fails to acknowledge the role this timber sale has in contributing to one of the worst polluters on the west coast of the U.S.--the KPC mill.

CLCC-17

The DEIS fails to state that the only contractual obligation the Forest Service has it to provide timber under BO.11 of KPC's contract. The maximum amount the contract calls for is 525 tons of wood per day or about 154 mmbf per year.

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

CLCC-14 Comment noted. Refer to the response to CLCC-13.

CLCC-15 Refer to the response to CLCC-3.

CLCC-16 KPC (and others) is responsible for legal operations of its facilities and this is beyond the scope of this project.

CLCC-17 The issue regarding the volume of timber the Forest Service needs to provide KPC is irrelevant and beyond the scope of this project.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

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CLCC-17 (cont.) The Forest Service fails to recognize that KPC's sawmills have no more contractual priority for timber than the independent sale program.

CLCC-18 The configuration of DEIS tables gives the false impression this sale barely meets national direction to not prepare below-cost timber sales.

In actuality, all the alternatives lose public money and represent a massive giveaway of valuable public resources. A supplemental DEIS must be drafted which includes alternative 10; the only one which actually gives a positive return to the government.

CLCC-19 which actually gives a positive return to the government.

CLCC-20 We are including community resolutions in favor of Alt. 10.

CLCC believes that the DEIS dramatically overstates the actual timber base in the Control Lake area and CLCC incorporates the comments of the Tongass Conservation Society as they relate to the cumulative effects and falldown issues.

CLCC-21

The decision in the DEIS to give KPC a special claim to the Control Lake contingency area rather than from any other area of the Tongass goes against the official Forest Service position that "other areas" means all areas managed for timber production on the whole Tongass National Forest.

CLCC-22

A supplemental DEIS should clearly state what timber independent operators will be allowed to bid for in the Control Lake area.

CLCC-23

CLCC-24 Access for timber salvage should be planned and guaranteed.

CLCC-25 CLCC reminds you that 55% of all businesses nationwide are small business.

The Forest Service has failed to find that there is not enough timber in the primary sale area to meet KPC's contract. This is the only condition that allows the Forest Service to offer timber in other areas under the contract.

CLCC-26

A supplemental DEIS must be done, with alternative 10 as an action choice, and needs to be just as clear on how all forest users are considered in any other action alternatives.

Jerry Jones
Independent timber operator-member
Control Lake Citizen's Coalition

Jerry Sharrard
Prince of Wales
Conservation League

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

CLCC-18 An SDEIS has been drafted and Alternative 10, along with two additional alternatives, are included. See response to SEAC-6.

The economic analysis in the DEIS has been corrected and updated to reflect new alternatives.

CLCC-19 Comment noted.

CLCC-20 Refer to response to TCS-4 and SEAC-11.

CLCC-21 Refer to the response to CLCC-17.

CLCC-22 All Control Lake project timber will be supplied to the independent sale program.

CLCC-23 See response to CLCC-8.

CLCC-24 Comment noted.

CLCC-25 Refer to the response to CLCC-17.

CLCC-26 An SDEIS has been prepared and Alternative 10 is included as an action alternative considered in detail.

Comments of Control Lake Citizen's Coalition & Prince of Wales Conservation League

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Attachments

1. 1994 Ketchikan area independent sale figures from Forest Service 2400-17 forms.

2. Resolutions of community support.

Responses to Control Lake Citizen's Coalition & Prince of Wales Conservation League

Comments of Craig Community Association Tribal Council

DEC-21-1995 11:52 CCA IRA 907 826 3997 P.01

CRAIG COMMUNITY ASSOCIATION
P.O. BOX 828
CRAIG, Alaska. 99921

RESOLUTION 95-06
Resolution of Support for the Elevenmile and Honker Divide Citizens' Alternate Site for US. Forest Service timber sale Selection.

CCA-1

WHEREAS, The Craig Community Association is a duly constituted Indian Tribe organized pursuant to the authority of Section 16 of the Act of Congress of June 18, 1934 (48 stat. 984), amended May 1, 1936 (49 Stat. 1250)

WHEREAS, The Craig Community Association Tribal Council is the governing body of the Craig Tribe, and

WHEREAS, United States Forest Service Regulations require the USFS to work with the federally recognized tribes on a Government-to-Government relationship

WHEREAS, The United States Forest Service has proposed a timber sale to take place in the Control Lake project area which is directly North of the communities of Craig and Klawock, and directly West of Thorne Bay, and

WHEREAS, A large portion of the Control Lake project area comprises of Land Use Designation III areas under the Tongass Land Management Plan, which specify that "(t)hese lands will be managed for a variety of uses. The emphasis is on managing for uses and activities in a compatible and complimentary manner to provide the greatest combination of benefits," and

WHEREAS, The purpose and need of the Control Lake timber sale is to provide timber for either the Independent Operator program, including Small operators or the long-term contract, and

WHEREAS, The Upper and lower Steel head and Rio Beaver drainage's have already been efficiently roaded and therefore are accessible for Small and independent timber Operators, who could not otherwise access said timber and

WHEREAS, The cutting units in these well roaded areas may provide for the specific species size and silvicultural needs of Independent and Small timber operators, and

WHEREAS, The Honker Divide watershed is part of the Control Lake project area and fulfills a service to the people of Prince of Wales Island by providing a wildlife recharge area for the remainder of the island and offers high quality recreational opportunities, and

WHEREAS, The People of Prince of Wales Island have formed a coalition called the Prince of Wales Citizens' Coalition and developed an alternative plan called the Elevenmile and Honker Divide Citizens' Alternative which intends to meet the needs of our local Small an independent

Responses to Craig Community Association Tribal Council

CCA-1 Comment noted. Note that the provision of timber under the long-term contract is no longer part of the purpose and need of the Control Lake project. Also note that Alternative 10 is included in the SDEIS as an alternative being analyzed in detail.

Comments of Craig Community Association Tribal Council

CCA-1 (cont.)

timber Operators while maintaining the integrity of our most valuable traditional subsistence, recreational and wildlife habitat areas,

THEREFORE BE IT RESOLVED: That the Craig Community Association Tribal Council demand the US. Forest Service to manage the Control Lake project area under the specification of the Elevenmile and Honker Divide Citizens' Alternative.

CERTIFICATION

THIS RESOLUTION WAS DULY ADOPTED ON December 21, 1995, by the following vote:
Ayes 6; Nays 0, Abstain 0; Absent 1.

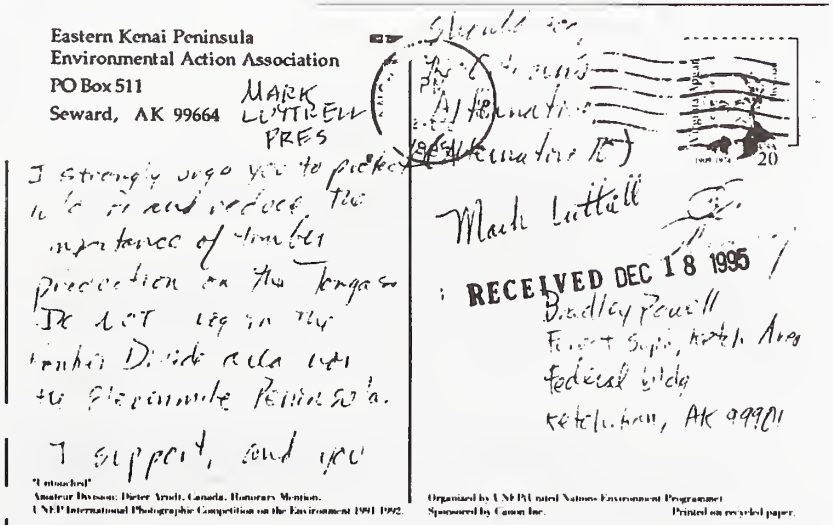
ATTEST:

A. Millie Stevens, President

Anna K. Isaacson, Secretary

Responses to Craig Community Association Tribal Council

Comments of Eastern Kenai Peninsula Environmental Action Association



Eastern Kenai Peninsula
Environmental Action Association
PO Box 511
Seward, AK 99664

MARK LUTTRELL PRES

Should be Alternative 10

Mark Luttrell

RECEIVED DEC 18 1995

Bradley Powell
Forest Supv, Kenai Area
Federal Bldg
Kenai, AK 99611

EKP-1 I strongly urge you to pick the Alternative that will reduce the importance of timber production on the Tongass. Do not log in the Honker Divide area nor the Elevenmile Peninsula.

EKP-1 I support, and you

"Untouched"
Amateur Division: Dieter Arndt, Canada, Honorary Mention.
UNEP International Photographic Competition on the Environment 1991-1992.

Organized by UNEP (United Nations Environment Programme)
Sponsored by Canon Inc.

Printed on recycled paper.

Responses to Eastern Kenai Peninsula Environmental Action Association

EKP-1 Comment noted. Please note that Alternative 10 is now being considered in detail in the SDEIS. Also, all action alternatives avoid the Honker Divide and Elevenmile areas from partly to completely.

Comments of Glacier Grotto

Glacier Grotto
Box 9062
Ketchikan, Ak 99901
(907) 225-4094
Or 225-7453

November 15, 1995

Forest Supervisor
Ketchikan Area
Tongass National Forest
Attn: Control Lake EIS
Federal Building
Ketchikan, AK 99901

To Whom it Concerns,

GG-1 After reviewing the Draft Control Lake EIS documents I was glad to see that some of the units that contained karst and caves have been dropped or deferred. As one of the people that helped map caves in 596-405, I was especially glad to see it dropped, or deleted. Obviously, members of this grotto would like to see all units containing moderate to highly developed karst dropped completely, and permanently.

We continue to be concerned about karst and caves that might be discovered during harvesting. After hiking through a few of the proposed Control Lake units, karst and caves seem to be scattered and well hidden. An example would include the small pocket of karst and a cave in unit 577-407. At first glance this unit would appear to have no karst. My question is how many more small pockets of karst are hidden in unlikely places, and how will newly discovered caves and karst be protected?

The Ketchikan Area of the Tongass has done a commendable job of recognizing the value of karst and caves. However, members of this grotto remain concerned that as timber becomes harder and harder to find that caves might once again be sacrificed in order to supply timber to KPC. This is why we would like to see units dropped not deferred.

Along with other members of this grotto I have seen the poor regeneration on some karst. We have also seen first hand the impact on caves that timber extraction does have. We have seen first hand untold destruction to once pristine cave systems. We strongly feel that past destruction of caves and karst should not be repeated.

Even though it appears that the Control Lake area has very little karst, caves must still be protected fully under the National Cave Resources Protection Act. Please keep that in mind throughout the entire process of timber extraction. Please also keep in mind that tectonic and talus caves are often found in non-karsted areas, but they still warrant protection.

Sincerely,

Marcel LaPerriere, President

Responses to Glacier Grotto

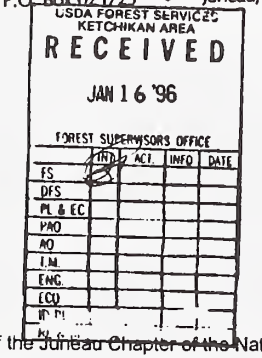
GG-1 Field inventory was conducted for all units in the Control Lake unit pool known or suspected to be located on karst. In addition, all field crews were instructed in identification of karst features so that they could provide input to the karst specialists. Unit design incorporated information about karst resources and proposed avoidance and or mitigation, as appropriate to the specific site.

The 1997 TLMP Draft Revision addresses inventory and protection of karst resources on a Forest-wide basis.

Comments of Juneau Audubon Society

JUNEAU AUDUBON SOCIETY

P.O. Box 021725 • Juneau, Alaska 99802



Phil Janik
Regional Forester
PO Box 21628
Juneau, AK
99802-1628

Dear Mr. Janik,

Dec. 21, 1995

I am writing on behalf of the Juneau Chapter of the National Audubon Society. I appreciate the opportunity to comment on the Draft Environmental Impact Statement for the proposed Control Lake Timber Sale, and outline our position in this letter.

JAS-1

Your decision to consider only alternatives 2,7,8, and 9 is a logical consequence of trying to meet your Purpose and Need statement, but is inappropriate because this Purpose and Need statement is incompatible with your directive to protect multiple use of the forest. I refer here to sec 101 of the 1990 Tongass Timber Reform Act which states, "...the Secretary shall, **to the extent consistent with providing for the multiple use** and sustained yield of all renewable forest resources, seek to provide a supply of timber from the Tongass National Forest which (1) meets the annual market demand for timber from such forest and (2) meets the market demand from such forest for each planning cycle" (emphasis added).

This statement makes very clear that meeting the market demand is to be accomplished only when compatible with "providing for the multiple use and sustained yield of all renewable forest resources". You very thoroughly document throughout your DEIS that alternatives 2,7,8, and 9 are incompatible with this directive.

We are concerned that the Purpose and Need for Action statement sets up an impossible situation. How can you possibly protect subsistence, sport hunting and fishing, commercial fishing and recreational users while making 187 million board feet of timber available for logging? The work you have done to prepare this DEIS is commendable, but none of the alternatives you are considering would be legal, except alternative 1. The only way you will be able to reconcile the conflicting task of finding an alternative that both provides timber and protects multiple use, is if you let go of the 187 million board feet requirement.

Responses to Juneau Audubon Society

JAS-1 The purpose and need for the Control Lake project has changed because of the modification of the long-term contract. The range of alternatives is now very broad and includes Alternative 10 along with another alternative that would harvest less than 100 MMBF (Alternative 11).

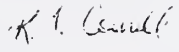
Comments of Juneau Audubon Society

JAS-2 Assuming that you will acknowledge the impossibility of providing 187 mbf while remaining in compliance with your legal requirements, I look to alternatives 3,4,5,6, and 10 for a plan to cut timber while providing for multiple use of the forest. It is clear that Alternative 10 is a superior choice. This alternative was developed by a wide variety of forest users including loggers and it allows sustainable timber harvest while protecting the livelihoods of those dependent on the forest for subsistence, and protects incomes based on fishing, guiding, and other tourism operations.

JAS-3 In closing, we request that you replace your Purpose and Need statement with something that will not drive you to break the law. Once that is accomplished, you will be free to consider alternative 10, which is an excellent example of public involvement in the planning process. Finally, we respectfully encourage you to choose either alternative 1 or 10.

Thank you.

Sincerely,



K. T. Coghill
President
Juneau Audubon Society

Responses to Juneau Audubon Society

JAS-2 Comment noted.

JAS-3 As noted above, the purpose and need has changed in the SDEIS.

Comments of Ketchikan Pulp Company

Ketchikan Pulp Company

Post Office Box 6600
Ketchikan, Alaska 99901
USA
TEL 907 225-2151
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December 22, 1995

Mr. Brad Powell
Forest Supervisor
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska, 99901

Re: Control Lake Draft EIS Comments

Dear Mr. Powell,

KPC-1

In the Central Prince of Wales EIS, the North Revilla EIS, the Polk Inlet EIS, and the Lab Bay DRAFT EIS (July 1995), the Forest Service (FS) has said Ketchikan Pulp Company (KPC) needs to have a three year supply of volume available for harvest and that volume should be 615 mmbf. In sharp contrast, the FS says in the DRAFT Control Lake EIS a three year supply of volume should range from 556.2 to 577.5 mmbf. There is a 58.8 to 37.5 mmbf decline in the amount of timber the FS thinks should be made available for a three year supply of volume. KPC can harvest only as much volume as the FS makes available. The FS has not built the three year pipeline as directed by Congress. The FS reported that KPC averaged 185.4 mmbf from March 1, 1989 through February 28, 1994, and then does not talk about the lack of timber supply as the primary reason for the low volume average, which is the failure of the FS to make available adequate timber. KPC has harvested all that has been made available. KPC has not changed its milling capacities since July, 1995, the date the Lab Bay DRAFT EIS was printed, that EIS states a three year pipeline is 615 MMBF. The FS should plan and release the full contract volume. (192.5 MMBF/year and any shortfall of volume from prior five year periods.)

The FS has not met its obligations to provide enough timber to the timber industry. The FS needs to select an alternative which will provide adequate volumes of economically viable timber. All of the proposed alternatives comply with such planning documents as the 1990 Resources Planning Act, the Alaska Regional Guide, the TLMP as amended (1979a), and the intent of the TLMP Draft Revision (1991a). Any one of the alternatives analyzed in the Draft EIS can be chosen. The FS should

OPERATING DIVISIONS

WARD COVE PULP MILL
THORNE BAY LOG

KETCHIKAN SAWMILL
TUXEKAN LOG
NAUKATI LOG

ANNETTE HEMLOCK SAWMILL
EL CAPITAN LOG

TL518.A95

FAXED 12/22

Responses to Ketchikan Pulp Company

KPC-1

As described in Appendix A of the DEIS, the maximum average annual rate at which KPC is generally allowed to harvest under the long-term contract (Section B0.52) is 192.5 MMBF. KPC's average harvest rate, obtained from contract records, during the 5-year period from March 1, 1989 through February 28, 1994 was 185.4 MMBF per year. Therefore, a 3-year supply of timber for KPC's operations under the contract was estimated to range from 556.2 to 577.5 MMBF.

The 615 MMBF figure used in other EIS's, was used as a planning target to help assign target volumes for projects such as Central Prince of Wales, Polk Inlet, and others. Each project produces an amount designated in the ROD for that project that contributes toward a 3-year timber supply. Many factors (appeals, litigation, markets, etc.)influence how much volume is actually available and when it is available for release.

The Forest Service strongly believes that it has met all contract obligations to date. Due to the closure of the Ketchikan pulp mill by KPC and the mutual modification of the long-term contract, the need to provide similar contract volumes in the future, no longer exists.

Comments of Ketchikan Pulp Company

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KPC-1 (cont.) choose an alternative which will best fill the gap in the timber supply pipeline and be economically feasible.

KPC-2 Habitat Conservation Areas (HCA) should not be implemented as part of this project. The HCA strategy has not been properly studied to see if it will work in Southeast Alaska. The strategy is adapted from the lower 48 and was not properly studied before it was implemented there, to the detriment of many families and communities.

KPC-3 The timber sales which come form the Control Lake EIS should be made available to both KPC and independent sale bidders. The timber industry is interdependent in nature, both the long term contract and the independent sale contractors need the support of each other. The FS should make available the maximum economically feasible volume to help meet all the volume requirements of the Tongass timber industry as a whole.

KPC-4 The timing restrictions on animals that are not threatened or endangered should be removed from the final EIS. These restrictions do nothing but increase the cost of operating a timber sale. Timing restrictions on animals that are not confined, but can move to habitat of equal value freely, should be dropped.

KPC-5 The Honker Divide area is an important timber producing area. On two occasions Congress has had the opportunity to protect the Honker Divide area as Wilderness and has not done so. There is a one half mile buffer on the canoe route to protect the recreation resource. The rest of the area should be scheduled for timber harvest according to the current TLMP revision of 1991. However, the Eleven Mile area

KPC-6 which is scheduled to be harvested in this plan should be set aside until later because the economics in the area are not able to provide a good return to the FS at this time.

Sincerely,

Kent P. Nicholson
Contract Manager

KPN:ak
cc: O. J. Graham
T. G. Hicks

TL518.A95

Responses to Ketchikan Pulp Company

KPC-2 The Control Lake project will be consistent with the revised Forest Plan and Record of Decision. The 1997 TLMP Revision incorporates a system of Old Growth Habitat areas as Land Use Designations (LUD's). The rationale supporting this approach is provided in the 1997 TLMP Revision and supporting documents.

KPC-3 Comment noted.

KPC-4 We disagree with your comment regarding timing restrictions. The policy of the Tongass National Forest is to identify and manage sensitive species and their habitats to prevent the species from becoming threatened or endangered because of Forest Service actions (1997 TLMP Revision). Timing restrictions are designated for species that, during a specific period of time, are very sensitive to a particular type of disturbance. Timing restrictions may be proposed for threatened or endangered species, USFWS species of concern, or Forest Service sensitive species. In addition, numerous game species, such as the Vancouver Canada goose, also receive timing restrictions to help maintain their populations at harvestable levels.

KPC-5 Comment noted.

KPC-6 Comment noted.

Comments of Southeast Alaska Conservation Council

Southeast Alaska Conservation Council

SEACC 419 Sixth Street, Suite 328 Juneau, AK 99801
(907) 586-6942 phone (907) 463-3312 fax

December 22, 1995

Bradley Powell
Forest Supervisor
Ketchikan Area, Tongass National Forest
Federal Building
Ketchikan, AK 99901

ATTN: Control Lake EIS

Dear Mr. Powell:

The following comments are submitted on behalf of the Southeast Alaska Conservation Council (SEACC) on the Control Lake Draft Environmental Impact Statement (DEIS). This project proposes clearcutting approximately 187 million board feet (mmbf) from an estimated 7,000 acres within the 201,371 acre project area on Prince of Wales Island. To accomplish this objective, the DEIS proposes constructing an estimated 169 miles of new roads, and reconstructing approximately 8 miles of existing road. Notably, the project area is outside the Ketchikan Pulp Company's (KPC) primary sale area.

SEACC is a broad-based coalition of 15 volunteer citizen organizations in 12 communities ranging from Ketchikan to Yakutat, including the Tongass Conservation Society (TCS) in Ketchikan, and the Prince of Wales Conservation League based in Craig. Our members live and work in many of the communities which would be adversely affected by this timber sale, including Coffman Cove, Whale Pass, Craig, Thorne Bay, Hydaburg, Klawock, Ketchikan and Saxman. The project area includes the spectacular Honker Divide and culturally important Elevenmile area on northern Prince of Wales Island which SEACC members, and others. use for the commercial, subsistence, and recreational use of fish and wildlife, and other purposes.

SEAC-1

Of primary concern to SEACC's members is the long-term, cumulative impact of the level of development proposed in the DEIS for this project area on their communities, livelihoods, and way of life. The National Environmental Policy Act (NEPA) requires the Forest Service to prepare an EIS that discloses and discusses "the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity." 42 U.S.C. Section 4332(2)(C)(iv). The DEIS, however, fails to adequately weigh the short-term benefits of supplying timber to Ketchikan Pulp under its 50-year pulp contract, which expires by its terms in just over eight (8) years, with this project's long-term costs. The DEIS fails to adequately disclose the loss of future productivity resulting from unsustainable logging under the Ketchikan Pulp

ALASKA SOCIETY OF AMERICAN FOREST DWELLERS, Point Baker * ALASKANS FOR JUNEAU * CHICHAGOF CONSERVATION COUNCIL, Tenakee Springs
FRIENDS OF BERNERS BAY, Juneau * FRIENDS OF GLACIER BAY, Gustavus * LYNN CANAL CONSERVATION, Haines
NARROWS CONSERVATION COUNCIL, Petersburg * PELICAN FORESTRY COUNCIL * PRINCE OF WALES CONSERVATION LEAGUE, Craig
SIERRA CLUB, Juneau * SITKA CONSERVATION SOCIETY * TAKU CONSERVATION SOCIETY, Juneau * TONGASS CONSERVATION SOCIETY, Ketchikan
WRANGELL RESOURCE COUNCIL * YAKUTAT RESOURCE CONSERVATION COUNCIL

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Responses to Southeast Alaska Conservation Council

SEAC-1 The relationship between short-term uses and long-term productivity is discussed in the DEIS and the SDEIS at the end of Chapter 4. Cumulative effects are displayed for all resource and use areas in both the DEIS and SDEIS. Additionally, the 1997 TLMP Revision includes analysis of cumulative effects on a Forest-wide basis.

Note that the KPC pulp mill closed in March 1997 and that the long-term contract has been modified for operation of the two KPC sawmills through 1999.

Comments of Southeast Alaska Conservation Council

SEAC-1 (cont.) contract within the project area, including the cumulative impacts to the commercial, recreational and subsistence uses of fish and wildlife, and the area's world-class cave and karst resources. It is neither good government policy nor legal to treat the short-term economic benefits to Ketchikan Pulp from this proposed timber sale as more important than the long-term stability of the local communities adjacent to the project area.

SEAC-2 The Honker Divide has long been recognized as one of the highest quality watersheds in Southeast Alaska by the Alaska Department of Fish and Game, Forest Service, and the public because of its commercial fish production, sport fishing values, critical wildlife habitat, and remarkable recreational opportunities. More recently, an interagency committee of wildlife biologists has recognized the need to keep this last, remaining large old-growth block on north Prince of Wales Island intact as part of a comprehensive plan to safeguard wildlife habitat across the Tongass. In each of the last two years, American Rivers, a national leader in river conservation, has identified the Thorne River-Hatchery Creek system (or Honker Divide) as one of the 10 most endangered rivers in the United States.

Most recently, a coalition of small timber operators, businessmen, Natives, and conservationists collaborated together to develop a reasonable alternative to the proposed action that safeguards the Honker Divide and culturally important Elevenmile area, as well as providing economical timber to local, independent operators. This brief synopsis of local, state and national support for managing this incredible area in a far different manner than proposed in this DEIS strongly suggests that consideration of any plans to develop this project area must await completion of the Tongass Land Management Plan (TLMP) revision. See also, *The Honker Divide Debacle*(SEACC 1991)(attached as Exhibit 1 and incorporated into these comments). For example, although the DEIS states that the 1/4 mile Wild and Scenic River corridor proposed for the Thorne River/Hatchery Creek system is protected, many Southeast Alaskans want this eligible river corridor expanded significantly. This proposed project would prevent consideration of such alternatives in the upcoming draft TLMP revision.

SEAC-3 These comments first explain why we support the **Control Lake Citizens' Alternative** (Alternative 10), and then raise several other significant issues which continue to plague timber sale project planning on the Tongass. These issues include this project's purpose and need, range of alternatives, falldown, highgrading, unacceptable restrictions of subsistence users, and the failure to take steps consistent with a scientifically credible and legally sufficient forest-wide wildlife habitat conservation plan at the project level or the recommendations contained in the 1995 Anadromous Fish Habitat Assessment. Addressing these issues now is critical to the sustainable use of the Tongass, and the conservation of the wildlife and fish habitat that supports important commercial, recreational, and subsistence hunting and fishing within the project area. Postponing a meaningful discussion of these issues until completion of the long overdue

Responses to Southeast Alaska Conservation Council

SEAC-2 We disagree that the project proposed in the DEIS would have prevented consideration of higher levels of protection for the Honker Divide area. The DEIS considered alternatives with varying degrees of protection for the Thorne River/Hatchery Creek system. All alternatives in the SDEIS display protection consistent with the Revised TLMP.

SEAC-3 Comment noted.

Comments of Southeast Alaska Conservation Council

SEAC-3 (cont) Tongass Land Management Plan (TLMP) Revision is a serious mistake. The issues are so fundamental to managing the Tongass for the long-term benefit of all forest users that they must be addressed in the development and implementation of ongoing timber sales.

SEAC-4 **SEACC Supports Adoption Of The Control Lake Citizens' Alternative For This Project And Rejects All Of The Action Alternatives Presented In The DEIS.**

Following the announcement of this proposed timber sale, a diverse group of people, including local small and independent timber operators, wood craftsmen, sport anglers and guides, sport and subsistence hunters, Natives, biologists and conservationists, including SEACC, the Prince of Wales Conservation League, and TCS, formed the Prince of Wales Citizens' Coalition. The Coalition created the **Control Lake Citizens' Alternative**, an environmentally and economically sustainable alternative to the Forest Service's massive proposal. Because the Forest Service decided that the **Citizens' Alternative** did not meet the purpose and need for this sale, it failed to meaningfully consider this alternative in the DEIS.

This decision by the Forest Service makes a mockery of this public planning process. This collaborative citizen effort to develop a compromise solution that provides for both sustainable jobs and a healthy forest, was relegated into the appendices of the DEIS and not fully considered in detail by the Forest Service. Resolutions of support for the approach taken by the Control Lake Citizens' Coalition were passed by the Craig and Klawock City Councils, the federally recognized tribal governments representing Alaska Natives from Craig and Klawock and the Haida Tribe/Hydaburg Cooperative.[1] The Southeast Regional Federal Subsistence Advisory Board is also on record with its support for the **Citizens' Alternative**. Unfortunately, the Forest Service has ignored this overwhelming show of public support. The approach laid out in the **Citizens' Alternative** was done so in the hope that getting in on the "ground floor" during scoping would give regular folks a chance to be an integral part of the planning process. Unfortunately, the Citizens' Coalition was forced to take a back seat to the demands of KPC.

SEAC-5 The Forest Service's timber-at-any-cost approach to timber sale planning in the Ketchikan Area violates the "balanced multiple use" mandate of the Tongass Timber Reform Act (TTRA). Likewise, the Forest Service has failed "to replace the 'contract driven planning process' with a methodology designed to ensure compliance 'with all applicable environmental law and standards.'" AWRTA v. Morrison, No. 95-35222, slip op. at 8956 (9th Cir. July 24, 1995)(as amended

[1]Copies of these resolutions are attached as Exhibit 2.

Responses to Southeast Alaska Conservation Council

SEAC-4 Note that Alternative 10 along with two other alternatives were analyzed in detail and included in Appendix B of the DEIS. Alternative 10 has been moved into the body of the SDEIS.

SEAC-5 The Forest Service disagrees that the DEIS violates TTRA, NEPA, NFMA, Section 810 of ANILCA, etc. Chapter 1 addresses consistency with legal mandates.

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SEAC-5 (cont.) Sept. 28, 1995)(quoting City of Tenakee Springs v. Franzel, 960 F.2d 776, 779 (9th Cir. 1992)). As more fully explained below, this DEIS violates the TTRA, NEPA, National Forest Management Act (NFMA), Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA), and other laws.

SEAC-6 **For the record, SEACC fully supports the Citizens Alternative.** Because the Forest Service failed to fully consider this alternative in detail, and because of the DEIS' legal inadequacies, we strongly recommend that the Forest Service halt this planning process and prepare a Supplemental DEIS that corrects the errors identified below and fully considers the **Citizens' Alternative** in detail.

SEACC wholeheartedly supports adoption of the **Citizens' Alternative** for this project because it:

- Provides 38 million board feet of timber to small timber operators on Prince of Wales Island and the independent sale program;
- Stays out of the heart of the Thorne River and Honker Divide area--one of the highest quality watersheds in all of Southeast Alaska--because of its commercial fish production, sport fishing values, critical wildlife habitat, and recreational use;
- Stays out of the Elevenmile Peninsula which has been used for centuries as a customary and traditional use area for hunting, fishing, and gathering. The Elevenmile Peninsula lies immediately north of the communities of Craig and Klawock;
- Is the only timber sale alternative in the Control Lake DEIS with a positive net financial return to U.S. taxpayers;
- Represents a huge investment of citizen and community energy in the Forest Service's timber sale planning process and an attempt to develop a compromise solution that provides for both sustainable jobs and a healthy forest;
- **Is supported in concept by the City Councils of Craig and Klawock, the Craig and Klawock tribal governments and the Haida Tribe in Hydaburg**; and,
- Supports an immediate and responsible transition from the current timber program to a program built upon a small business set-aside independent sale program; a program that invests in people, sustainable jobs and the long-term health of our forest.

Responses to Southeast Alaska Conservation Council

SEAC-6 Your support for Alternative 10 is noted. The Forest Service disagrees with your statement "...is the only timber sale alternative in the Control Lake DEIS with a positive net financial return to U.S. taxpayers." The economic efficiency analysis in both the DEIS and the SDEIS do not support this. Further, the analysis shown in the SDEIS has been corrected to reflect the action alternatives more accurately.

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General Comments

SEAC-7

A. The Purpose And Need For This Project Violates The TTRA, NEPA, ANILCA And The NFMA.

Chapter 1 and Appendix A of the DEIS offer rationalizations for why clearcutting is scheduled in the Control Lake Project Area at this time. However, no reasoned explanation is provided as to when or how the Forest Service determined that the purpose and need for this proposed project was to provide approximately 187 mmbf to KPC and/or the Ketchikan Area Independent Sale Program. As noted in the EISs for other KPC offerings within the Ketchikan Area, the selection of a timber target for those projects come from schedules adopted in closed Forest Service meetings in the late 1980's and early 1990's. A conclusion that this project's unreasonably narrow purpose and need resulted from similar "behind closed doors" scheduling meetings is supported by the lack of any documentation in either the 1979 TLMP, as amended, or the SDEIS for the TLMP Revision identifying this precise timber target, from this precise project area, at this precise time.

This "**black-box**" process violates NEPA by shielding the most important decisions made in the planning process from any public participation. It further violates NEPA by unreasonably restricting the range of alternatives evaluated in this DEIS.

This action violates the process set out in the 1985-86 TLMP Amendment, which remains the controlling Forest Plan. TLMP, as amended, requires a public, mid-level scheduling process that was not followed on the Ketchikan Area. The failure to comply with TLMP violates the NFMA.

Finally, this process violates Section 810 of ANILCA by failing to evaluate alternatives that would avoid restrictions on subsistence resources and uses.

While the Forest Service has the discretion to select the purpose and need for a proposed project, the TTRA restricted this discretion by requiring the Forest Service to only "seek to provide" a supply of timber to KPC or other timber operators, subject to the requirements of other applicable laws, and only "to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources." Therefore, selecting a purpose and need for this project that elevates supplying a specific volume of timber to KPC and/or the independent sale program above the Forest Service's substantive legal obligations "to cause the least adverse impact possible on rural residents who depend upon subsistence uses of the resources [within the project area]," or to provide for viable, healthy populations of fish and wildlife, violates the Section 101 of the TTRA.

Responses to Southeast Alaska Conservation Council

SEAC-7

The 1979 TLMP and the proposed 1991 TLMP indicated timber sale opportunities existed for the areas allocated for timber harvest within the Control Lake area. The rationale for the Control Lake project is included in Appendix A of the DEIS. The 1997 TLMP has changed allocations and the areas available for timber harvest. This SDEIS includes an updated Appendix A to reflect the changes. Timber sale schedules with projected volumes often change throughout the life of a schedule, thus they are not ripe for NEPA. NEPA is more useful at the actual project level, such as this EIS process for Control Lake.

The Forest Service disagrees that Control Lake violates the mid-level planning process referenced in the 1985-86 TLMP Amendment. Extensive on-the-ground investigations were used in conjunction with public scoping and follow-up meetings that led to landscape zoning for the project area. These zones were used for harvest unit prescriptions, alternative development, and as feedback to the forest planning process. See Chapter 2 for more details. The 1997 TLMP Revision no longer requires mid-level analysis.

The Forest Service disagrees that this project violates Section 101 of the TTRA. Various alternatives, including the Appendix Alternatives, that respond to the project significant NEPA issues are included in the DEIS. To make the EIS clearer and to better respond to the 1997 TLMP Revision, this SDEIS has moved Alternative 10 into the text of the EIS and includes two new alternatives, Alternatives 11 and 12, in response to LUD changes in the 1997 TLMP. Harvest volumes of the action alternatives now range from 38 to 123 MMBF. Note that the alternative frameworks and how they respond to a set of issues is more reflective of the range of the alternatives.

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SEAC-8

In describing the purpose and need for this project, the Forest Service incorrectly relies upon its intention "to move toward the desired future condition as identified in the current Forest Plan (TLMP 1979a, as amended) and in the TLMP Draft Revision (TLMP 1991a). This desired future condition is described in the current Forest Plan under the Management Direction/Emphasis for each management area." DEIS at p. 1-2. The 1991 draft Revision is just that -- a draft, and obsolete as well. We request that letters from Secretary Glickman, Undersecretary Lyons, and Regional Forester Janik identifying the shortcomings of Alternative P from the 1991 draft TLMP Revision be incorporated into the record.[2] As noted by Secretary Glickman, "Since [1991] ..., we have gained additional resource, economic and social information .... This new information should be incorporated into the final plan."

Although we agree that the project area includes areas designated as LUD III and IV in the 1979 TLMP, as amended, these designations remain subject to the site-specific determinations made during project planning, in compliance with NEPA and ANILCA. See AWRTA v. Morrison, No. 95-35222, slip op. at 8949-50 (9th Cir. July 24, 1995)(as amended Sept. 28, 1995). Moreover, the proposed impacts to the Honker Divide-Sweetwater Lake Area (VCUs 574, 575, 576, and 578) are inconsistent with the Management Direction/Emphasis for Management Area K08 provided for in TLMP, as amended. The 1986 Amendment to TLMP states (p. 141) that:

> Management direction is to manage VCUs 574, 575, 576 and 578 according to the Final Honker Divide Land Use Plan, as modified by the 84-89 LTS EIS. Protect the wildlife and fish in the entire unit as needed to enhance the recreation experience. (emphasis added).

The purpose and need for this project, as well as the range of alternatives considered in the DEIS, show that the Forest Service has elevated fulfilling the Ketchikan Pulp contract above complying with existing forest management direction and the law. Thus, the purpose and need for this project is arbitrary and capricious and violates NEPA, ANILCA, NFMA, and the TTRA.

SEAC-9

Finally, we must express our disbelief that the Forest Service actually intends to offer any of the timber from this proposed project under the Ketchikan Area Independent Sale Program. The facts show that since 1990 the Forest Service has placed fulfilling the KPC contract above all other interests. In fact, the failure of the Forest Service to provide timber to meet the demand from local operators on

[2]Letter from DOA Secretary Glickman to Senator Hatfield, Chairman of the Senate Committee on Appropriations (Aug. 4, 1995); Letter from DOA Undersecretary Lyons to Senator Hatfield, Chair of Senate Committee on Appropriations (July 28, 1995); Letter from Regional Forester Janik to Belinda Chase, Editor of Ketchikan Daily News (August 18, 1995); Letter from Regional Forester Janik to Senator Stevens (July 28, 1995).

Responses to Southeast Alaska Conservation Council

SEAC-8 Areas where the Plan(s) appear to be obsolete usually coincided with significant issues addressed in the project planning process. This is the case in the Control Lake project. These issues (e.g., Honker Divide, Elevenmile, etc.) are addressed by a combination of alternative frameworks, landscape zoning, site-specific project designs, etc. The EIS has been designed to allow the decision-maker to make the most informed decision, including deferral of areas to keep options open for future forest planning.

SEAC-9 A portion of the Control Lake timber sale has always been planned for offering to independent operators. With modification of the long-term contract, all of the Control Lake sale will be offered through the independent timber sale program. Alternative 10 was analyzed in detail for the DEIS, but was placed in an appendix because it did not meet the purpose and need. Now that the purpose and need has been modified, Alternative 10 is addressed in detail in the main text of the SDEIS. See also response to CLCC-1.

Comments of Southeast Alaska Conservation Council

SEAC-9 (cont.)

Prince of Wales was one of the driving motivations behind development of the **Citizens' Alternative**. As noted in the Draft 1995 ANILCA 706(a) Report:

> "Many of the smaller scale wood products manufacturers are located on Prince of Wales Island. Although individual operations may vary, they generally fall into three categories: 1) very small sawmills with a total capacity of less than one million board feet annually, including portable mills and mills with special use permits for on-site processing, 2) cedar salvage, shake and shingle producers, and 3) specialty wood workers and producers of high quality musical instrument components."

The **Citizens' Alternative** directly addresses the needs of these smaller wood product manufacturers. The central location of the Control Lake timber sale makes this the perfect sale for these types of operations - the Forest Service is throwing away a golden opportunity by failing to consider the **Citizens' Alternative** in detail. Once again the demands of KPC's long term-monopoly contract have hindered the ability of independents to compete.

If recent agency practices are any indication, independent timber operators on the Ketchikan Area have good reason to wonder if they will receive any wood from the Control Lake sale, even though the Project Area is outside KPC's primary sale area. If the Forest Service is really interested in providing timber to local, independent operators, then these offerings should be explicitly identified in the supplemental DEIS.

SEAC-10

B. Objections To Forest Service's Calculations Of KPC's Average Cutting Rate.

We have questions about the figures used to calculate the volume of timber the Forest Service estimates is necessary to provide KPC with a three year supply of timber. The DEIS, at p. 1-5, estimates that the Forest Service must supply a volume of timber ranging from 556.2 to 577.5 mmbf to provide KPC with a three year timber supply. The DEIS also states that KPC's average cutting rate during the last five year period, ending February 28, 1994 was 185.4 mmbf per year.

According to information on KPC's cutting rates prepared by the Forest Service, and dated November 1995,[3] the average cut by KPC during fiscal years 1990-94 (five years) was 162.4 mmbf; the average cut by KPC during fiscal years 1991-95 (five years) was 152.6 mmbf; the average cut from 1986-95 (ten years) was 165.6 mmbf; and the average cut from 1980 to 1995 (16 years) was 159 mmbf. What information was used to arrive at the 185.4 mmbf figure identified in the DEIS?

[3]These figures are attached as Exhibit 3.

Responses to Southeast Alaska Conservation Council

SEAC-10 The issue regarding the volume of timber the Forest Service needs to provide KPC is irrelevant and beyond the scope of this project.

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SEAC-10 (cont.) Using the Forest Service's own figures for the most recent five years (152.6 mmbf) results in an estimated three year supply of about 458 mmbf, nearly 100 mmbf less than that supply identified in the DEIS. Please explain this discrepancy.

In meeting KPC's demand for timber, the Forest Service must also account for the fact that because APC is no longer operating the Sitka pulp mill, the great majority of pulp logs from all federal timber sales must now go to KPC for processing. Moreover, contract provision B0.62 states that the "Forest Service shall seek to specify sufficient Offerings ... that totals at least a three years of operations ...." (emphasis added). The plain language of this provision means that the three year timber supply goal was not intended to force the Forest Service to ignore the needs of all other forest resource users.

SEAC-11 **C. The Narrow Range of Alternatives Considered in the DEIS Violates NEPA and Section 810 of ANILCA.**

The range of alternatives considered in the DEIS violates NEPA by failing to include reasonable alternatives resulting from the Forest Service exercising its authority, under the KPC contract or agency regulations, to cancel or terminate the KPC contract, or to debar or suspend KPC's operations under the contract. Under Section B0.7 of the contract, the Forest Service may terminate the contract "upon a determination that Purchaser's operations would cause serious environmental damage ...." The DEIS clearly discloses that KPC continued operations have and will cause serious environmental damage in this, and other project areas in the Ketchikan Area. The serious cumulative impacts to fish, wildlife, water, and karst resources, as well as the significant restrictions to subsistence deer harvesting from this and other adjacent projects clearly qualify as "serious environmental damage." See also Section B8.222 (Offering Termination by Forest Service because Purchaser's operations would cause serious environmental damage).

The Forest Service may also terminate Ketchikan Pulp's contract under agency regulations "for serious or continued violation of [its] terms." 36 CFR 223.116(a)(1). According to provision B6.01 of the contract, KPC is required to conduct its operations "in compliance with Federal, State, and local statutes, standards, orders, permits, or other regulations." KPC has a long history of violating its air and water permits. KPC has seriously and continuously degraded the air and water in Ward Cove and the surrounding area which has resulted in significant toxic accumulations. In 1991, 1992, and 1993 KPC was either the largest or second largest toxic water polluter in the entire Pacific Northwest, including Washington, Oregon, Idaho, and Alaska. See EPA's Toxic Release Inventory Reports for 1991-1993 (attached as Exhibit 4). Most recently,

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SEAC-11 Termination of the KPC contract is beyond the scope of this project. KPC is responsible for legal operation of its facilities and this is also beyond the scope of this project. As noted in the response to SEAC-10, KPC volume-related issues are beyond the scope of this project.

The Forest Service disagrees that the DEIS clearly discloses that KPC continued operations have and will cause serious environmental damage in this and other project areas in the Ketchikan Area. Table 2-4 in Chapter 2 and Table 2-2 in Appendix B of the DEIS display projected effects on the landscape zones by alternative. The ability of each of the landscape zones to function is noted for each alternative. The ability of these zones to function could be one measure of serious environmental damage. The cumulative effects analysis used projections of the 1979 TLMP and Alternative P of the 1991 Draft TLMP Revision. The project analysis provides feedback to the forest planning process. Addressing the projected cumulative effects is part of the forest planning process. Information from the Control Lake (and other) project was used in part in the development of the 1997 TLMP Revision. Note the new cumulative effects information in the SDEIS that use the 1997 TLMP projections.

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SEAC-11 (cont.) Ketchikan Pulp pled guilty to criminal and civil violations of its air and water discharge permits governing operation of its pulp mill.[4]

Agency regulations permit the Forest Service to "debar" a purchaser for "conviction of or civil judgment for ... a commission of a criminal offense in connection with ... performing a public contract ...," or "violation of the terms of a Government contract...." See 36 CFR 223.137(a)(1)(i) and (a)(2). Both agency regulations and provisions of the KPC contract further allow the Forest Service to "suspend" KPC's operations for "commission of ... a criminal offense in connection with ... performing a public contract ...," 36 CFR 223.142(a)(1)(i), or for breach of a "material" provision of the contract, Contract Provision B9.3. According to provision B6.01 of the contract, Ketchikan Pulp must conduct its operations "in compliance with Federal, State, and local statutes, standards, orders, permits, or other regulations." Unfortunately, KPC has never done so. See Exhibit 5.

"The existence of a viable but unexamined alternative renders an environmental impact statement inadequate." Resources Ltd., Inc. v. Robertson, 35 F.3d 1300, 1307 (9th Cir. 1994)(quotations omitted). To serve NEPA's information purposes, an EIS must give a reasoned analysis of the evidence before the agency and make that evidence available to all concerned. The DEIS, however, fails to disclose Ketchikan Pulp's past and continued breach of the contract, the environmental consequences from these actions, or the management options thus provided the agency. This omission prevents the decision maker and public from making a reasoned and well-informed decision.

SEAC-12 While the Forest Service refused to meaningfully consider any alternative which would not provide significant volume to KPC from this project, it considered alternatives which are not "necessary and consistent with sound management of public lands," or "would compromise the ability of the [old-growth] blocks and corridors of the retention strategy to [maintain well-distributed viable wildlife populations]." See DEIS at 4-183, 184, and 4-127. We find it remarkable that the Forest Service has spent all this time, energy and money studying alternatives that, in order to fulfill KPC's contract requirements, would violate the law. Yet, at the same time, the Forest Service refused to consider a lawful alternative prepared by local citizens to respond to legitimate needs other than fulfilling KPC's contract. The **Citizens' Alternative** was also the only alternative with a positive net financial return to U.S. taxpayers.

The decision by Congress to not cancel the KPC contract in the TTRA does not shield the Forest Service from considering alternatives that flow from the

[4]See, *USA v. Ketchikan Pulp Company*, No. A95-025 CR (D. AK Mar. 6, 1995)(Criminal Plea Agreement); *USA v. Ketchikan Pulp Company*, No. A92-587-CV (JKS) (D. AK Mar. 29, 1995)(Consent Decree).

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SEAC-12 Refer to responses to SEAC-6, SEAC-7, SEAC-8, SEAC-9, and SEAC-11.

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SEAC-12 (cont.) agency's authority to terminate, debar, or suspend KPC's contract operations in this DEIS. First, Section 101 of the TTRA allows the Forest Service to only offer timber under the contract subject to the requirements of other applicable laws, such as Section 810 of ANILCA and NFMA, and only "to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources." Even the faulty and incomplete analysis contained in this DEIS demonstrates these requirements can not be met for this project area. In addition, alternatives which include termination of the contract and debarment or suspension of contract operations, must be analyzed in the DEIS for this analysis to meaningfully inform the Congress and Administration as to whether fulfilling the contract volume requirements for KPC is consistent with meeting the agency's legal obligations to provide for balanced and sustainable multiple use on the Tongass. The 1992 Irland Group report, prepared for Congress pursuant to Section 301(e) of the Tongass Timber Reform Act, like the 1991 draft Revision, is outdated and fails to take into account new information now available to the agency.

SEAC-13 Because all the action alternatives in the DEIS, result in a significant possibility of a significant restriction on subsistence uses of deer, this DEIS violates Section 810 of ANILCA and the Tongass Timber Reform Act. The purpose and need for this project has prevented the Forest Service from meaningfully considering an alternative, the **Citizens' Alternative**, that takes reasonable steps to minimize adverse impacts upon subsistence.

SEAC-14 **D. The Discussion In The DEIS Concerning Falldown Is Exceedingly Technical, Confusing, And Poorly Written.**

For the record, SEACC agrees with, and incorporates into our comments, the analysis prepared by TCS on Timber Supply/Falldown, on pages 3-6 of their comments, dated December 14, 1995. In addition, we make the following additional comments:

Why was information and data from the site-specific MELP prepared by the contractor for this project not disclosed or analyzed in the DEIS? This data must be disclosed and the Forest Service must then apply a reasonable falldown factor to the result.

We further request that the comments submitted by the Sierra Club Legal Defense Fund on the CPOW Supplemental DEIS, on September 25, 1995, be incorporated into these comments, and the planning record for this project.

Finally, we wish to incorporate the attached letter from Dr. K. Norman Johnson to William Shoaf, dated September 17, 1994 (Exhibit 6), into the planning record for this project. This letter concluded that "Only one thing is sure, the longer the Forest waits, the farther will be drop in harvest and more destabilizing will be its impact." We agree with Dr. Johnson that the writing is already on the wall. We

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SEAC-13 Refer to responses to SEAC-7, SEAC-8, and SEAC-9.

SEAC-14 Refer to response to TCS-5.

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SEAC-14 (cont.) urge you to deal with this issue immediately by beginning the necessary transition to a program that invests in people, sustainable jobs and the long-term health of our forest. We believe the **Citizens' Alternative** is the only alternative disclosed in the DEIS that accomplishes these objectives and we urge its adoption.

SEAC-15 **E. The Forest Service Relied On An Arbitrary And Capricious Procedure For Calculating Proportionality For This DEIS.**

In determining proportionality, the Forest Service must use timber volume, not acres, and volume must be determined based on an accurate methodology rather than the TIMTYP database. The Forest Service has failed to do so in this DEIS. The Forest Service simply states that, "For the Control Lake analysis, the base proportions were calculated using the current Forest Handbook to evaluate compliance with the proportionality requirement." DEIS at 3-63. However, the court in The Wildlife Society, et al. v. Barton, No. J93-001-CIV (Alaska), issued an order finding that the Forest Service's use of the methodology in the "current Forest Handbook" to determine proportionality was "arbitrary and capricious."

Two reports were completed and released this past spring on alternative methods for determining proportionality. The first report, Evaluation of Photo-Point Inventory Methods for the Estimation of Timber Volume and Proportionality in Southeast Alaska, is a scientific evaluation of four different methods for determining proportionality. This report was completed in April of 1995. The second report, Alternatives To Using The Timber Type Map For Determine Proportionality Under The Tongass Timber Reform Act, is a May 23, 1995 summary of the first report, and a recommended direction for implementing Section 301(c)(2) of the Tongass Timber Reform Act on the Tongass. Comments on these reports prepared by the Alaska Chapter of The Wildlife Society were submitted on June 28, 1995 by the Sierra Club Legal Defense Fund on behalf of its clients, plaintiffs in three ongoing cases on the Tongass, including SEACC. We request that these reports, and The Wildlife Society's comments, be incorporated into the planning record for the Control Lake project.

As stated in those comments, we agree with the first report's conclusion that "method C is probably advisable since photo measurements can be made with higher precision without substantially increasing cost." The DEIS fails to disclose the alternative methodologies or apply the best available approach, Method C, which was recommended in the first report. The Forest Service must apply the recommended alternative to the TIMTYP methodology for this sale to successfully halt highgrading as mandated by Congress in the TTRA. Achieving proportionality in the Control Lake project area is also essential for the conservation of highly productive wildlife habitat.

Additionally, in determining proportionality for volume class 6 and 7 stands, the Forest Service must separate volume class 6 and 7 stands. In this DEIS, and in all past timber sales, the Forest Service has lumped the two volume classes together

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SEAC-15 Refer to response to TCS-11.

The documents referenced in your comment have been prepared and/or reviewed at the Regional level. Direction for conducting the Control Lake proportionality assessments for the DEIS and SDEIS has been provided by the Regional office. Therefore, inclusion of these documents in the Control Lake Planning Record is not necessary.

The current Forest Service direction, provided by the Forest Handbook, is that high volume is represented by volume classes 6 and 7 combined.

Since the Control Lake volume is all planned for the independent timber sale program, proportionality calculation is no longer required.

Forest Service must separate volume class 6 and 7 stands. In this DEIS, and in all past timber sales the Forest Service has lumped the two volume classes together

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SEAC-15 (cont.) resulting in excessive logging in class 7 stands. Field surveys should be done to identify locations of high volume timber and verify the actual amount of volume classes 4, 5, 6, and 7 in the Control Lake project area.

A review of the proportionality analysis contained in the Control Lake DEIS reveals that the Forest Service has failed to meet proportionality requirements under all of the action alternatives in MA K14, and alternative 2 and 8 in MA K15. Because "the Ketchikan Area 10-year sale program ... does not project a second entry into the Control Lake Project Area before 2004," DEIS at 4-79, there will be no opportunity to fix any proportionality departure in MA K14 before the end of the KPC contract. Consequently, all of the alternatives considered in the supplemental DEIS should meet proportionality requirements today.

SEAC-16 **F. Impacts From This Proposal Jeopardize The Ability Of Local Communities And Residents To Capitalize On The Growth In Tourism And Recreation Business Opportunities.**

The Forest Service fails to meaningfully incorporate its own recreation and tourism employment projections in the DEIS. The DEIS claims that under action alternatives 2 and 7, which include heavy entry into the Honker Divide, there may be negative impacts on recreation and tourism growth.

Forest Service further admits that the Control Lake Project will likely lead to the displacement of recreationists seeking specific primitive or semi-primitive recreational opportunities that no longer will be available in areas of active timber harvest or road construction, such as the Control Lake project area. "As more areas are harvested for timber, displaced recreationists seeking primitive and semi-primitive recreational opportunities would find it increasingly difficult to find places to recreate on Prince of Wales Island." See DEIS at p. 4-157.

This statement reflects the Forest Service's "timber-first, timber at all costs" bias on POW. Their own numbers project substantial growth of tourism and recreation related industries in Southeast Alaska yet they insist on logging at levels that would jeopardize local communities' and residents' ability to capitalize on that growth. Tourism is the fastest growing sector of Southeast Alaska's economy and is already the third biggest employer in the region behind commercial fishing and government. Sales like Control Lake, with its demand for huge, unsustainable amounts of logging and extensive road building, essentially mortgage the island's future in order to fulfill the needs of KPC's long term timber contact.

SEAC-17 **G. The Forest service's Strategy For Maintaining Old-Growth Dependent Wildlife Is Scientifically Indefensible And Illegal.**

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SEAC-16 Note that both Alternatives 2 and 7 are no longer being considered in detail in the SDEIS. The action alternatives included in the SDEIS, avoid harvest in the Honker Divide area to varying degrees and provide a wide range of harvest intensity levels with a correspondingly wide range of effects on recreation.

SEAC-17 Each of the alternatives, including the no action alternative, may affect some subsistence activities, due primarily to the cumulative effects of past harvest. Section 810 of ANILCA provides for an extensive review of any action on federal lands which may adversely affect subsistence uses, but allows such actions to take place if 1) proper notice is given to State agencies, local communities, and other pertinent bodies; 2) hearings in the vicinity of the area involved are conducted; and 3) such an action is determined necessary, consistent with sound management principles for the utilization of public lands, will involve the minimal amount of public lands necessary to accomplish the proposed action, and reasonable steps will be taken to minimize the adverse impacts upon subsistence uses and resources resulting from the proposed action. The range of alternatives included in the SDEIS provides a range of scenarios for satisfying item 3 above.

Note that the subsistence analysis in the SDEIS has been revised to reduce the influence of habitat capability models on the conclusions. These models are not intended to predict population levels or set bag limits. Their use is intended to give a relative comparison between alternatives of the effect on habitat. The 1997 TLMP EIS no longer uses habitat capability models for any species except for deer.

The current mechanism for managing subsistence resources is through the Federal Subsistence Board which looks at input from subsistence users, past harvest levels, hunter success rates and other information including habitat capability models in making their determinations.

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SEAC-17 (cont.) The Forest Service must do more than merely maintain viable populations of wildlife. ANILCA requires the agency to maintain healthy and huntable populations of subsistence species. See 16 U.S.C. Sec. 3112(1). Accordingly, the alternatives considered in the DEIS must provide for healthy, harvestable populations of subsistence fish and wildlife resources. Since the Wildlife Analysis Areas (WAA) in the project area presently do not have the deer habitat capability to provide the deer required to support the current level of subsistence and sport hunting in the area, any of the logging proposed in the action alternatives will only exacerbate the situation.

SEAC-18 The Forest Service proposes a Project-Specific retention strategy for the Control Lake project area. We are concerned with the adequacy of the Forest Service's on-the-ground assessment of site-specific impacts from the action alternatives.

The DEIS states that all of the alternatives in the DEIS would result in impacts consistent with the implementation of the TLMP (1979a as amended), Alternative P of the TLMP Draft Revision (1991a), the recommendations of the Interagency Viable Wildlife Population Committee (VPOP)(Suring et al. 1993) and the draft environmental assessment on interim habitat guidelines for maintaining well-distributed viable populations within the Tongass National Forest (October 1994) (Draft EA 1994). This is insufficient to ensure that the Forest Service will be able to maintain healthy and huntable populations of wildlife widely distributed across the Forest. **All the experts who have reviewed Tongass wildlife conservation measures have urged the Forest Service to do more now.**

According to the risk analysis included in the report prepared by the VPOP Committee), viable populations on North Prince of Wales Island will be in serious jeopardy if timber harvest takes place as planned under the TLMP Draft Revision (1991a). See Suring et al., 1993. Why didn't the DEIS disclose what the VPOP Committee thought would happen to wildlife in the Northern Prince of Wales Geographic Province under Alternative P and the 1979 TLMP? Moreover, the DEIS fails to identify or address the recommendations of the Congressionally mandated peer review of the VPOPS wildlife strategy conducted by the Pacific Northwest Research Station (See Kiester and Eckhardt 1994) (Herein referred to as PNW Peer Review) or disclose and analyze the recommendations made in the reconciliation memo from the VPOP committee in response to the PNW Peer Review. Those actions are set forth in Appendix II to the Interagency Committee's Response to the Peer Review of: A Proposed Strategy for Maintaining Well-distributed, Viable Populations of Wildlife Associated with Old-growth Forests in Southeast Alaska (May, 1994)(attached as Exhibit 7).

In designing alternatives for consideration, all of the immediate interim actions recommended by the VPOP Committee, in response to the PNW Peer Review, must be considered for maintaining options for conserving healthy wildlife populations pending completion of the TLMP Revision. Among the immediate actions recommended by the VPOP Committee were expanding proposed "large"

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SEAC-18 The 1997 TLMP Revision incorporates a much more extensive old-growth retention strategy through a series of old-growth reserves. The Control Lake SDEIS incorporates this more extensive series of old-growth reserves.

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SEAC-18 (cont.)

and "medium" Habitat Conservation Areas (HCA) and connecting corridors, prohibiting logging and road building in volume class 6 and 7 old-growth forest occurring below 800 feet in elevation, and connecting HCAs with habitat corridors that are off-limits to logging. The VPOP Committee also recommended establishing "small" HCAs in each large watershed on a project basis.

It is crucial to note that the Draft EA 1994, which the Forest Service believes the alternatives to be consistent with, did not disclose or analyze the PNW Peer Review or the immediate actions recommended for habitat protection by the VPOP Committee in response to the PNW Peer Review. Specific shortcomings in the draft EA approach include: (1) the absence of wildlife corridors and matrix management prescriptions to ensure connectivity; (2) the failure to expand HCAs and require that high-quality old-growth forest be included in HCAs; (3) permitting salvage sales within HCAs; (4) failing to actually allocate any lands for "large" and "medium" HCAs; and (5) the failure to provide for adequate habitat protection around goshawk nests located in 1994.

The VPOP Committee, the PNW Peer Review, and the Draft EA, conclude that current practices are insufficient to maintain viable populations of wildlife. Arbitrarily implementing selected pieces of the VPOP Committee's strategy is simply not enough; all of the recommended actions must be disclosed and analyzed in the DEIS to ensure that all options remain open for developing a comprehensive viable wildlife population management strategy in the TLMP Revision. As explained in the Petition and Request for Stay filed by the Alaska Rainforest Campaign with Regional Forester Phil Janik on June 24, 1994, (attached as Exhibit 8) proceeding with logging without fully implementing the VPOP Committee's viability strategy would be scientifically indefensible and illegal.

The Forest Service itself questions the effectiveness of the measures proposed in the DEIS to maintain the long-term viability of wildlife. The Forest Service states: "The level of harvest and roading produced by Alternatives 2, 7, and 8 would compromise the ability of the blocks and corridors of the retention strategy to function within the project area. Alternative 2 permits extensive harvest within the old-growth blocks and corridors identified under this strategy. Alternative 7 and 8 permit moderate amounts of harvest, and Alternative 9 allows only limited harvest." See DEIS at p. 4-127 "The following discussion illustrates the expected effectiveness of the TLMP Draft Revision (1991a) in maintaining viable wildlife populations while continuing timber harvest and associated activities....This illustrates that the long-term effect on wildlife populations from continued timber harvest at the rate scheduled by the TLMP Draft Revision (1991a), may be to reduce numbers of many species to non-viable levels within the Project Area." See DEIS at p. 4-102. The Forest Service lacks any discretion to take such risks.

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SEAC-19 The Forest Service should include a map with all old-growth retention blocks and corridors identified for the selected alternatives and clarify how it intends to maintain healthy and huntable populations of wildlife. The Forest Service needs to halt this planning process and prepare a supplemental DEIS to address these deficiencies. The supplemental DEIS should clarify the intent of the old-growth retention strategy if harvesting will result in further fragmentation, reduced block and corridor size, and increased threats to wildlife health.

SEAC-20 The DEIS states (at p. 4-126) that Public law 104-19 prohibits the Forest Service from implementing Habitat Conservation Areas. The Senate Recision Bill was a spending bill in effect only until the end of FY 95, September 30, 1995. Since the restrictions on developing HCAs are no longer in effect, the Forest Service can now legally implement an HCA strategy.

SEAC-21 The Forest Service states that it is developing a revised long-term old-growth retention strategy in its revised TLMP and that it is "highly probable" that this new strategy will substantially reduce long-term cumulative effects on biodiversity and old-growth habitat. See DEIS at p. 4-129. Moreover, the potential of a new wildlife plan does not obviate the Forest Service from its responsibility to explain how the Control Lake project will be consistent with a comprehensive wildlife conservation plan that provides for healthy wildlife populations across the Forest. By only considering alternatives that log in sensitive areas, reduce the size of old-growth blocks, require large amounts of new road building, and reduce the effectiveness of wildlife corridors, the Forest Service is both eliminating its options for future action to maintain healthy wildlife and threatening the health of wildlife directly in this project.

SEAC-22 Further, we note that the requirement in NFMA planning regulations to provide for wildlife viability is directly applicable to activities, such as this proposed project, which implement a Forest Plan; this "minimum management requirement ... guide[s] the development, analysis, approval, implementation, monitoring and evaluation of forest plans." See 36 CFR 219.27 (emphasis added).

SEAC-23 The U.S. Fish and Wildlife Service decided not to list the Queen Charlotte Goshawk and Alexander Archipelago Wolf as threatened or endangered in 1995, primarily because the Forest Service committed itself to revising TLMP and implementing an interim wildlife habitat strategy. The alternatives proposed in the DEIS are likely to have negative impacts on goshawks, DEIS at p. 4-115. We are surprised the Forest Service appears to be taking such a lackadaisical approach to protecting the long-term health of the wolf and goshawk. Given the amount of roading and loss of quality habitat for goshawks and the wolf's primary prey, deer, resulting from any of the alternatives considered in the DEIS, the Forest Service is failing to take a proactive approach to insuring these species remain at healthy population levels. The Forest Service must use its discretion and management authority to rigorously enforce the laws applicable to national forest management. The agency's failure to do so in the Pacific Northwest has

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SEAC-19 Comment noted. A revised old-growth retention strategy is incorporated in the 1997 TLMP Revision which is based on the conservation strategy developed by the Viable Population Committee. Refer to response to SEAC-18.

SEAC-20 Public Law 104-19 no longer applies. See response to SEAC-19.

SEAC-21 Refer to response to SEAC-18.

SEAC-22 Refer to response to SEAC-18. Note that wildlife viability is clearly provided for in the SDEIS and in the new Forest Plan.

SEAC-23 Refer to response to SEAC-22.

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SEAC-23 (cont.) forced the taking of drastic and expensive conservation management actions under the Endangered Species Act, and resulted in severe economic and social disruptions to local communities. The Forest Service should take steps now to avoid increasing the risk for threatened and endangered listing of wildlife species on the Tongass.

SEAC-24 The Forest Service must seriously consider legal alternatives that maintain the viability of wildlife on the Tongass. The **Control Lake Citizen's Alternative** (Alternative 10) was developed with protecting the most sensitive wildlife areas in mind and should be seriously considered and adopted as the selected alternative. Under the **Citizen's Alternative** there would be no logging in Honker Divide "ridge-to ridge", north of Forest Road 30, within the Logjam Creek area in the Rio Roberts Watershed, or on the culturally important Elevenmile area. The **Citizen's Alternative** also minimizes road building. The **Citizen's Alternative** would leave the 32,013 acres within the old-growth blocks identified for the Project to serve as retention. It is the only alternative, besides the No Action Alternative, that does not reduce the size of the largest unfragmented old-growth patch in the Project Area. Under the **Citizen's Alternative**, there would be no logging in wildlife corridors. In this critical wildlife area, the **Citizens' Alternative** would have the lowest impact on wildlife.

H. The Proposed ANILCA Findings Are Arbitrary And Capricious.

SEAC-25 The deer population needed to support current rural and non-rural deer hunting levels already exceeds habitat capability by 33 and 44 percent in WAAs 1318 and 1319. See DEIS at p. 4-163. The action alternatives would all worsen the situation. Cumulative logging in this project area is expected to create a significant possibility of a significant restriction to subsistence use of deer and marten by the year 2010 and black bear by the year 2030, even with restrictions on Ketchikan hunters. See DEIS at p. 4-182, 4-173. By 2054, the habitat capability of Sitka black tail deer is expected to decline by 70% compared to 1954. Black bear habitat capability is expected to decline 52%, wolf habitat capability 70%, and marten habitat capability 67%. See DEIS at p. 4-104.

The standard used by the Forest Service is unlawful. A finding that proposed activities "may" restrict subsistence is what the law requires. The heightened standard used by the Forest Service, "a significant possibility of a significant restriction," is contrary to court rulings and Congressional intent.

SEAC-26 Although the heightened standard makes no meaningful difference with respect to deer, it may effect findings regarding other fish and wildlife species, such as salmon. The Anadromous Fish Habitat Assessment found that "procedures similar to those currently used to protect fish habitat on the Tongass ... failed to prevent declines in fish habitat capability, and resulted in increasing and now significant risk to the viability of salmon and steelhead stocks (in the Pacific

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SEAC-24 See response to SEAC-18.

SEAC-25 Refer to response to SEAC-17. Also note that the Forest Service disagrees with your assertion that the standard used is unlawful. The language used with regard to ANILCA is appropriate. The "significant possibility" standard is the same as the "may" standard. Also see response to SEAC-11.

SEAC-26 Harvest units and roads proposed for the Control Lake project were field-verified by resource specialists including fisheries biologists, hydrologist/soil scientists, and wildlife biologists. Resource specialists designated sites for implementation of required mitigation measures, such as TTRA buffers and BMP's directed by Forest-wide Standards and Guidelines. Resource specialists were also given the authority to recommend additional mitigation measures as appropriate to the site. These included measures such as: extending no-harvest buffers to include adjacent floodplains, muskegs, or forested habitats for protection of wildlife/fisheries/water quality; specifying selective harvest or individual tree harvest buffers to reduce blowdown potential and for protection of fisheries/water quality; prescribing silvicultural systems other than standard clearcutting up to and including group or individual tree selection for an entire harvest unit for resource protection including protection of fisheries/water quality; and specifying split-yarding and/or full suspension and prescribing no-cut buffers on Class III streams and V-notches as appropriate to protect water quality. These mitigation measures go beyond the minimum requirements of the Forest Plan, and offer increased protection of fisheries and water quality resources based on the resource specialist's assessment of site-specific conditions (refer to Appendix F of the DEIS for the Unit Design Cards).

The site-specific mitigation measures applied to the Control Lake units are in accordance with the increased mitigation measures recommended in the AFHA Report. The Report does not recommend adoption of every element of the PACFISH

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SEAC-26 (cont.) Northwest)...." See AFHA at p. 7. Because the DEIS failed to disclose and analyze the findings in this important report, the Forest Service has failed to provide a reasoned explanation for its finding that "potential effects of the proposed timber harvest and road construction alternatives on salmon spawning and rearing habitat would be minimal or eliminated by applying the Forest Service standards, guidelines, and prescriptions....Based on the implementation of site-specific prescriptions for protecting salmon spawning and rearing habitat, the immediate and foreseeable effects on the abundance and distribution of salmon for subsistence uses in the Project Area would not be measurable." See DEIS at p. 4-177.

SEAC-27 The DEIS's finding (at p. 4-183) that the significant possibility of a significant restriction of deer is necessary because "there are few alternatives that would avoid a significant possibility of subsistence restrictions somewhere on the National Forest" is arbitrary and capricious. As noted above, the Ninth Circuit has found that the TTRA was enacted to replace the "contract driven planning process" relied upon to justify significant restrictions to subsistence harvest of deer in this project. The Control Lake project area is also outside of KPC's primary sale area, and as such, the Forest Service cannot legally find that fulfilling the requirements of the contract make it necessary to restrict subsistence use in the project area.

SEAC-28 The anticipated restrictions of subsistence resources and uses raise serious concerns about the range of alternatives provided in the DEIS. The DEIS failed to consider any action alternative which lessens the impacts to subsistence and deer habitat capability. Only the **Citizens' Alternative** and the No Action Alternative allow for a continued level of deer and deer habitat capability, but these alternatives were not seriously considered.

Moreover, the 1979 TLMP, as amended, did not consider impacts to subsistence because, at the time it was released, Section 810 of ANILCA had not been enacted as law. Tiering to a plan that ignores subsistence to justify restrictions to subsistence can only be described as bullheaded. Moreover, the Tongass Timber Reform Act did not direct the Forest Service to meet market demand for timber no matter what the costs to other resources and their users, but only to the extent that it can do so consistent with multiple use objectives and sustained yield, and only to the extent consistent with "other applicable law," including Section 810 of ANILCA. Consequently, the Forest Service can no longer elevate Ketchikan Pulp logging, under an outdated forest plan, over other statutory requirements.

SEAC-29 The Forest Service failed to hold subsistence hearings in the affected communities of Craig, Hollis, Hydaburg, or Whale Pass. This violates Section 810 because the DEIS reveals that each of these communities "may" suffer restrictions to their subsistence deer harvesting if this project is implemented.

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SEAC-26 (cont.) management strategy, but does recommend increased protection through implementation of mitigation such as: increased buffers on Class I and II streams to include adjacent floodplain and wetland fens; and special consideration of Class IV stream channels (to include ephemeral streams and V-notches). The site-specific mitigation measures applied to Control Lake units are also in accordance with ACMP and FPA requirements to protect important fish and wildlife habitat within 300 feet of a catalogued fish stream. Therefore, we believe the mitigation measures specified in the Control Lake Unit Design Cards are consistent with state and federal law and policy, and will protect fisheries, water quality, and wildlife resources. Resource specialists will have the opportunity to adjust or fine tune mitigation measures and unit design at the time of final layout. Should federal or state law, or Forest Service Standards and Guidelines change prior to implementation of the sale, adjustments to unit and buffer design can be accomplished during final layout.

Additionally, the DEIS did consider the AFHA report findings in relationship to the effectiveness of BMP's, particularly in the Old Franks drainage on Prince of Wales Island (see DEIS, p. 4-36).

SEAC-27 This section has been revised to reflect the alternatives analyzed in the SDEIS and the modified purpose and need.

SEAC-28 As noted above, the range of alternatives analyzed in the SDEIS is now quite broad, the alternatives include Alternative 10, and the purpose and need has changed, in part due to the modification of the KPC long-term contract. Further, the Control Lake alternatives are designed to be consistent with the 1997 TLMP Revision, which does incorporate Section 810 of ANILCA. Therefore, this comment is no longer relevant.

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SEAC-30 The Forest Service states that it intends to reduce competition for subsistence resources and increased impacts to wildlife by closing logging roads after logging in the project area is completed (DEIS 4-140). What information does the Forest Service have to support its conclusion that closing roads will effectively reduce these impacts?

SEAC-31 The Forest Service deals with the project's impacts to subsistence resources, especially deer, by shucking any responsibility for mitigating the impacts to subsistence resources under this timber sale and concluding that at some time in the near future it may be necessary for the Federal Subsistence Board to restrict the number of deer harvested by non-rural hunters to leave adequate numbers of deer for subsistence users. This is insufficient mitigation and an abdication of the Forest Service's responsibility to protect subsistence resources under ANILCA and TTRA.

SEAC-32 We were surprised to find that the Forest Service candidly acknowledges that "Alternative 2 does not appear to be necessary and consistent with sound management of public lands due to the high level of impact on subsistence use and wildlife habitat. Alternative 7 does not appear to be consistent because of the level of wildlife habitat impacts in the Honker Divide Area." See DEIS at p. 4-184. Alternative 8 would also be illegal considering the Forest Service's comments about its negative impacts on wildlife viability. DEIS at p. 4-127.

By failing to meaningfully consider an alternative that minimized subsistence impacts (i.e. the **Control Lake Citizen's Alternative**), the Forest Service's conclusion that reasonable steps were taken (DEIS 4-184) is completely arbitrary.

1. The DEIS Fails To Disclose Or Follow Recommended Measures To Adequately Conserve Fish Species In The Project Area.

SEAC-33 The DEIS states (at p. 4-44) that "...none of the alternatives are predicted to have significant adverse effects to fisheries resources because of the implementation of stream buffers, other TLMP guidelines, and Forest Service BMP's." But, the Forest Service's own report to Congress, The Anadromous Fish Habitat Assessment (AFHA), concluded that current protective measures are "not fully effective" to protect fish habitat from the impacts of logging, and recommends that additional protective measures be taken. Without disclosing and discussing the AFHA findings, the Forest Service has not taken the hard look required at the environmental consequences from the proposed project on streams and watersheds in the project area. In addition, it significantly impedes informed public participation in the decision-making process.

As part of the AFHA analysis, the Forest Service reviewed the PACFISH management strategy for protecting anadromous fish habitat in the Pacific Northwest and found many similarities. This conclusion, and other analysis, led these experts to conclude that current protective measures implemented on the

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SEAC-29 Section 810 of ANILCA does not require hearings to be held in every community potentially affected by an action. It only requires "a hearing in the vicinity of the area involved" to be conducted. Instead of just one hearing, as required by ANILCA, the Forest Service held four hearings on the Control Lake project including hearings in Klawock, Thorne Bay, Coffman Cove, and Ketchikan.

SEAC-30 The access management discussion in the Transportation and Facilities and the Wildlife sections have been edited and additional information has been added in the SDEIS, including the effectiveness of closures.

SEAC-31 We disagree. Opportunities for mitigating the effects of the project on deer habitat and subsistence resources have been extensively incorporated into all of the alternatives in both the DEIS and the SDEIS. For example, the Control Lake project represents the most extensive use to date of non-traditional clearcutting. The range of alternatives under consideration in the SDEIS is wide and, as was the case for the DEIS, the no action alternative can always be chosen if the Forest Supervisor believes that the Control Lake project will conflict with ANILCA.

SEAC-32 Note that Alternatives 2, 7, 8, and 9 have been deleted from detailed consideration in the SDEIS.

SEAC-33 Refer to response to SEAC-26. Further, we disagree with your statement that "AFHA has established that the 100-foot riparian buffers...do not adequately protect fish on the Tongass." This is an extreme generalization of the results of the AFHA report, inaccurately taken out of context. We also disagree with your statement that "full implementation of habitat modification measures consistent with the PACFISH strategy" is called for.

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SEAC-33 (cont.) Tongass were not effective. This is not surprising because the strategies developed in PACFISH were intended for application in Alaska from the very beginning. (Forest Service public meeting, Petersburg AK, June 28, 1995). Thus, the recommendations made in the AFHA should be disclosed and applied to the alternatives considered, as it represents the best scientific information presently available on how to protect anadromous fish habitat.

NFMA explicitly states that the Forest Service must "insure" that logging on the Tongass does not "seriously and adversely affect water conditions or fish habitat." 16 U.S.C. Sec. 1604(g)(30(E)(iii). AFHA has established that the minimum 100-foot riparian buffers on Class I streams, and those Class II streams flowing directly into Class I streams, do not adequately protect fish habitat on the Tongass. Accordingly, NFMA compels the full implementation of the specific recommendations made in AFHA to ensure that sufficient riparian habitat is maintained during and after logging operations.

SEAC-34 In conjunction with NFMA, the Forest Service must also meet the requirements of the Alaska Coastal Management Plan (ACMP) which requires that fish and wildlife protection on federal lands be no less than that provided on state lands. Under the state Forest Practices Act (FPA), which is incorporated into the ACMP, there can be no degradation of important fish and wildlife habitat within 300 feet of a fish stream. Thus, the Forest Service has a legal obligation to manage riparian zones consistent with the ACMP and FPA, and the alternatives considered for this project should be developed accordingly.

SEAC-35 "The Forest Service needs to take a quantum leap to protect fish habitat on the Tongass." (Dr. Fred Everest, Forest Service public meeting, Juneau AK, December 11, 1995) (See also attached transcript from KTOO broadcast, Exhibit 9). But the DEIS and Forest Service Regional Forester Phil Janik's recent memo to Forest Supervisors and Staff Directors regarding the implementation of AFHA on August 25, 1995 do not make that leap or adequately protect salmon over the long-term. Like AFHA, the memo divides steps into those to be taken in the revision of TLMP, and those to be taken under current direction. Given Senator Stevens' effort to block the revision of TLMP, this division becomes arbitrary and fails to do more now to protect the valuable fish habitat in the project area. In the supplemental DEIS, the Forest Service should disclose and analyze the extra habitat protection measures recommended in AFHA, and apply those measures in this project.

Moreover, the memo's half-hearted message -- "These items assigned to the Forest Supervisors and the Director of WFEW will only be accomplished to the extent they can be as part of other on-going work, without substantially disrupting or delaying project planning or implementation" -- leaves us concerned that the Forest Service isn't serious about taking necessary steps to protect the Tongass rich fish habitat. "One watershed analysis per year as funding and staff permit" is

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SEAC-34 The Forest Service believes that fish and wildlife protection on federal lands has been no less than that provided on state lands and that the protection provided by the implementation of standards and guidelines, BMP's, and other mitigation measures included in the Control Lake project, will protect riparian zones consistent with the ACMP and the FPA.

SEAC-35 Refer to responses to SEAC-26 and SEAC-33.

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SEAC-35 (cont.) hardly implementing the recommendations of AFHA or taking the quantum leap necessary to protect our world class salmon resource.

SEAC-36 In the Control Lake DEIS, the Forest Service did not compete a true watershed analysis as recommended by AFHA. The AFHA recommended immediately implementing watershed analysis using the concepts presented in A Federal Agency Guide for Pilot Watershed Analysis (1994) before implementing logging or roading activities that could significantly influence fish habitat. See AFHA, Appendix C, at 39. Please provide a reasoned comparison of the procedures used in the watershed analyses for this DEIS and those recommended by AFHA in the supplemental DEIS, with a reasoned explanation for the choice made. This issue is particularly troublesome with this proposed project because of the level of development which has already occurred in several watersheds, the increased disturbance proposed in this project, and the fisheries values of streams in the project area, including Steelhead Creek, east Goose Creek, Logjam Creek, Goose Creek, Election Creek, Rio Roberts, and the Thorne River. See DEIS at p. 4-46.

SEAC-37 Finally, the DEIS identifies the location of roads and cutting units "with high potential for direct sediment delivery to a Class I stream." DEIS at p. 4-35. The experts who prepared the AFHA, however, "recommended that timber harvest and roading activities on potentially unstable slopes be reduced or eliminated." We recommend that all these identified units and roads be deleted from consideration for this project.

SEAC-38 We are also concerned about the effects of landslides on stream habitat. Many landslides occurred in the general area of the Control Lake timber sale on October 25 and 26, 1993 during a large storm event. Logging in Southeast Alaska influences the frequency and size of landslide events. The DEIS admits that such impacts will occur from the proposed activities. The Forest Service must disclose credible scientific information to support its conclusion that proposed management activities will not increase the risk of landslides or violate state water quality standards. What are the potential impacts of landslides in the project area on fish habitat, and will logging on steep slopes and unstable soils increase the likelihood or magnitude of slides in the future? The issue needs to be fully discussed and responded to.

SEAC-39 The Forest Service's reluctance to immediately apply the AFHA recommendations to ongoing timber sale projects reminds us of Yogi Berra's comment that, "this seems like deja vu all over again." We remember in 1989 when the Forest Service chose not to follow the expert recommendations from the National Marine Fisheries Service when selecting between alternative riparian management strategies for the long-term protection of salmon and resident fish habitat. The Alaska Federal District Court subsequently found that decision to be arbitrary and capricious and enjoined logging within 100 feet of all Class I and II streams in the project area. The Forest Service should do the right thing now and

Responses to Southeast Alaska Conservation Council

SEAC-36 As noted in this comment the AFHA report *recommended* implementing the Federal Agency Guide for Pilot Watershed Analysis (1994). The level of watershed analysis provided for the Control Lake DEIS is similar to that provided in the federal watershed analysis procedures. Appendix E in this SDEIS summarizes watershed assessment effects used in the Control Lake project. The analysis considered riparian conditions, potential for stream temperature increases, reductions in large woody debris recruitment, fish habitat conditions, water quality, sediment erosion (road and surface), mass wasting hazard, sediment delivery potential, and likely road traffic volumes. These analyses were performed for 167 watersheds in the Control Lake Project area which were summarized in the DEIS. Watershed evaluations were conducted for all 3rd order drainage basins (regardless of size) that drained to anadromous or resident fish streams. In addition, unlike standard federal watershed analysis procedures, the analyses performed for the Control Lake EIS included a great deal of field work because they considered the field observations that were made during field work for the entire unit pool, including harvest units that were dropped or deferred (see response to SEAC-26). The level of development that had previously occurred in the various drainage basins in the Project Area was also considered.

SEAC-37 The AFHA report does not call for removing all high MMI soil areas from the suitable timber base, but does call for individual site assessment. The Control Lake units and roads located on high MMI soils were reviewed on a site-specific basis and many portions of units and roads were moved or deleted and/or additional mitigation measures were prescribed as a result.

SEAC-38 The comment states that the "DEIS admits that such impacts will occur from the proposed activity" and then incorrectly states the the DEIS concludes that proposed management activities will not increase the risk of landslides. As initially noted, the DEIS specifically states that landslides do occur as the result of timber

Comments of Southeast Alaska Conservation Council

SEAC-39 (cont.) implement the recommendations in the AFHA report without delay in this, and other ongoing timber sale projects.

SEAC-40 The Forest Service should disclose the monitoring information it has collected to show that its BMPs are implemented and effective in eliminating damage to water quality and fish spawning and rearing habitat. SEACC has submitted several reports to the Forest Service since 1991, demonstrating that the agency has not adequately monitored implementation of BMPs and their impacts on fish and water quality in the Ketchikan Area. Those reports are incorporated into these comments by this reference. Specific monitoring information is much more helpful than general information showing that BMPs have been shown to protect water quality in Southeast Alaska as emphasized in the DEIS. See DEIS at p. 4-51. Indeed, the EPA addressed this very issue when it stated: "[W]e agree that implementation of [BMPs] and buffer strip requirements will reduce sediment effects. However, the responsibility is on the Forest Service to demonstrate in advance that timber harvest and road construction will not cause beneficial use impairment and cause standard exceedances." (emphasis added). NEPA prohibits the use of conclusory statements unsupported by data, authorities, or explanatory information when deciding to proceed with a proposed action. The DEIS fails to present credible information demonstrating that BMPs are implemented, and effective in protecting riparian resources.

SEAC-41 NEPA requires the Forest Service to identify appropriate mitigation measures when presenting alternatives for consideration in the DEIS. 40 C.F.R. Sec. 1502.11 (f). In particular, mitigation plans to limit habitat fragmentation, degradation of coastal marine resources, and restrictions on subsistence use must be developed and disclosed. Monitoring information confirming the effectiveness of these mitigation measures must be fully disclosed for public review.

Thank you for considering these comments.

Best Regards,

Buck Lindekugel
Conservation Director

Jeremy Anderson
Grassroots Organizer

Tim Bristol
Grassroots Organizer

exhibits attached

Responses to Southeast Alaska Conservation Council

SEAC-38 (cont.) harvest. The issue is fully disclosed in the section titled "Surface Erosion" in the Soils section and the Water, Fish, and Fisheries section under road erosion which discusses the potential for increased sediment delivery and debris torrents.

SEAC-39 Refer to responses to SEAC-26 and SEAC-33.

SEAC-40 The Tongass National Forest recently released its "Annual Monitoring and Evaluation Report" for Fiscal Year 1995 (Report R10-MB-323). This document, which is the fourth annual Monitoring and Evaluation Report for the Tongass, states that "significant progress has been made toward accomplishing effectiveness monitoring objectives outline (d) by the 1992 Memorandum of Agreement between the Forest Service and the Alaska State Department of Environmental Conservation." This report documents the BMP implementation monitoring results for the Ketchikan Administrative Area. These results indicate that BMP's were fully implemented more than 90 percent of the time, and that in almost all cases an attempt was made to implement BMP's to some degree. In April of 1994, the three Tongass Forest Supervisors signed a joint BMP effectiveness monitoring strategy that identified five key issues: riparian buffer effectiveness in protecting fish habitat and water quality, effectiveness of Class III stream protection measures in minimizing stream bank erosion, and the relation of soil mass movement rates with roads and harvest units. The Ketchikan Area is currently initiating an effectiveness monitoring plan. Results are not yet available.

The Clean Water Act (Sections 208 and 319) recognized the need for control strategies for non-point source pollution. To provide environmental protection and improvement emphasis for water and soil resources and water-related beneficial uses, the National Non-point Source Policy (December 12, 1984), the Forest Service Nonpoint Strategy (January 29, 1985), and the USDA Nonpoint Source Water Quality Policy (December 5, 1986) were

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Responses to Southeast Alaska Conservation Council

SEAC-40 (cont.)

developed. Best Management Practices (BMP's) were recognized as the primary control mechanisms for non-point sources of pollution on National Forest System lands. This perspective is supported by the EPA in their guidance, "Nonpoint Source Controls and Water Quality Standards (August 19, 1987).

Use of BMP's is a means to ensure protection of resources and uses, while achieving multiple use objectives. Application of BMP's represents state-of-the-art technology for non-point source pollution control. The reasonable implementation, application, and monitoring of BMP's, in effect, achieves compliance with the intent of the Clean Water Act, State water quality standards and consistency with the State's non-point source program. The EPA Water Quality Standards Handbook, Chapter 2, states: "Proper installation, operation, and maintenance of State approved BMP's are presumed to meet a landowner's or manager's obligation for compliance with applicable water quality standards. If subsequent evaluation indicates that approved and properly installed BMP's are not achieving water quality standards, the State should take steps to: (1) revise the BMP's, (2) evaluate and, if appropriate, revise water quality standards (designated beneficial uses and water quality criteria), or both."

BMP's are designed to meet and maintain State water quality standards. The Forest Service cooperatively works with the Alaska Department of Environmental Conservation under a Memorandum of Understanding (MOU) relative to BMP implementation and effectiveness. BMP's are the primary tool on the Tongass National Forest to mitigate the effects of logging activities on water quality. This project is consistent with the State of Alaska's antidegradation policy and will maintain and protect existing instream water uses and the level of water necessary to protect the existing uses.

SEAC-41

Appropriate mitigation measures for the Control Lake project alternatives are identified at the end of Chapter 2. The effectiveness of mitigation measures is addressed for each discipline in the Mitigation subsection of each section in Chapter 4.

Comments of Tongass Conservation Society

Tongass Conservation Society
PO Box 23377 Ketchikan, AK 99901 (907)225-5827

December 21, 1995

Bradley Powell, Forest Supervisor
USDA - Forest Service
Federal Bldg.
Ketchikan, AK 99901

Mr. Powell:

Thank you for the opportunity to comment on the proposed Control Lake timber sale. I am presenting these comments on behalf of the Tongass Conservation Society (TCS), a local non-profit, conservation organization concerned about the welfare of the Tongass National Forest. TCS represents a diverse constituency including Alaska Natives, local residents, property owners, businessmen, subsistence users, saw mill operators, environmentalists, recreationists, cavers, sport hunters/fishermen, professional guides, and commercial fishermen. Many of our members use the project area, so your proposed action has the potential to affect the welfare of our organization.

TCS-1 | Purpose and Need

Please clearly state when and how the Forest Service arrived at the exact 187 mmbf figure for the Purpose and Need for this project. For instance, is there any documentation in either TLMP 1979 or TLMP Draft Rev which substantiates this precise volume from this precise project area for this precise time period? If this direct linkage to TLMP does not exist (as a recent FOIA to your office indicates), then it would seem that the Control Lake project is outside the umbrella of the Forest Plan. TLMP 1979 was very clear in its expectancy of mid-level plans (aka, Area Analyses), which were necessary to bridge the information gap between a Forest Plan, containing only limited site specific biological data, and individual project plans. There have been no amendments to the Forest Plan which have dissolved this obligation. Perhaps it would be best to delay this project until ratification of the TLMP Revision.

TCS disagrees that long-term contractual need is a basis for establishment of the mysterious 187 mmbf target. First, one of the decisions to be made in this NEPA process is how to split the 187 mmbf harvest between KPC and the independent program (Ch 1 pp 2). Obviously, there is no contractual need driving the independent program, and a reasonable decision which could arise from this project is full allocation to the independent program (after all, the entirety of the project area is outside the Primary Sale Area). In other words, it is pre-decisional to assume any specific level of volume from this project will be allocated to the long-term contract. Therefore it is moot to extrapolate project Purpose and

Responses to Tongass Conservation Society

TCS-1 The project purpose and need described in the SDEIS has changed from that presented in the DEIS. The rationale for this new purpose and need and the reasons for the modification are described in Chapter 1 and Appendix A of the SDEIS. Also see response to SEAC-7.

Comments of Tongass Conservation Society

TCS-1 (cont.)

Need from as yet unspecified long-term volume levels.

Second, the unilateral decision to assign a 187 mmbf purpose and need to this project is stale because it did not consider the significant new information that the entirety of the Tongass National Forest (including areas originally allocated to the APC long-term contract, as well as sales explicitly ear-marked for the the independent program) is now being used to meet the obligations of the KPC long-term contract. TCS notes the September 1995 ruling by the 9th U.S. Circuit of Appeals which said the Forest Service must consider other alternatives because of changed contractual conditions, i.e., cancellation of the APC contract.

TCS-2

Third, the rationale to supply KPC with no amount other than the maximum allowable entitlement of 192.5 mmbf (Ch 1 pp 5-7) simply has no contractual basis. The Forest Service obligation ends with offering enough timber to run the mill at a 525 ton/day capacity, or approximately 154 mmbf annually. Clearly, there is also contractual latitude for the Forest Service to provide the minimum annual entitlement (27.5 mmbf per B0.52), if KPC were to significantly scale down operations. These actions are reasonable, as well as contractually viable, and need to be addressed as alternatives analyzed in detail in this NEPA process.

Perhaps if the Forest Service hadn't habitually over-stated its contractual obligations, it wouldn't now be necessary to rob from the independent program by opening contingency areas to long-term sale logging. TCS notes that Appendix A pp 12 still maintains "This schedule must provide a minimum of 615 MMBF [3 year supply of 205 mmbf/year] current timber supply through the end of the contract." Appendix A still suffers from the fatal flaw of previous long-term NEPA documents, which presumed the requirement to offer KPC 205 mmbf annually in order to reach a total sale quantity of 8.25 mmmbf by the end of the contract. B0.31 clearly states that 8.25 mmbf is a ceiling, not a floor, and "... the Regional Forester is not obligated to make available for cutting more than [8.25 mmmbf]...". Besides, 205 mmbf is in excess of KPC's annual logging limits of 192.5 mmbf established by B0.52.

TCS-3

A recent opinion by Texas Judge, Robert M. Parker (1993 WL 172660 (E.D.Tex)) completely countermands this 'result-driven decision-making process.' Both Judge Parker's decision and others (731 F.Supp 970, 989 (D.Colo.1989)) found that situations where "the Forest Service had first established timber production goals and then formulated its 'alternatives' in a manner guaranteeing that the Service planners would reach these goals...does not constitute a consideration of a broad range of alternatives as contemplated by 36 CFR Sec 219.12(f)." This 'all-alternatives-must-meet-the-stated-purpose-and-need' death spiral has ALREADY been found to be in violation of NEPA. It is a waste of the taxpayers' money to continue production of a plethora of EIS's which have no chance of being favorably reviewed by the courts.

Perhaps what is most disturbing about this very narrow Purpose and

Responses to Tongass Conservation Society

TCS-2

The issue regarding the volume of timber that the Forest Service needs to provide KPC is irrelevant and beyond the scope of this project, especially now that the long-term contract has been modified.

TCS-3

Refer to responses to TCS-1, TCS-2, and SEAC-7. Note that the new range of alternatives in the SDEIS includes no action and three action alternatives with harvest volumes between 38 and 113 MMBF. Note also that alternatives are driven by issue frameworks, which can include volume as one, but not the only, criterion.

Comments of Tongass Conservation Society

TCS-3 (cont.)

Need statement is that it restricts the range of alternatives. With TCS's assistance, the POW Citizens' Coalition went to a great deal of effort to tell the Forest Service that they wanted to see an alternative of approximately 40 mmbf, which would be ear-marked for independent timber purchasers. However, this 'Citizens' Alternative' was artifically eliminated from detailed study, because it did not meet the stated Purpose and Need, which emphatically has no foundation in the Forest Plan, the long-term contract, or the inherent capability of the project area to sustain timber production.

TCS fully supports the Control Lake Citizens Alternative, which recognizes the wisdom of limiting logging to sustainable levels in areas adjacent to established communities and of supporting small business timber purchasers. TCS requests the Forest Service to issue a new Purpose and Need for this project and to analyze in detail a full range of alternatives, including the Control Lake Citizens' Alternative. In short, prepare a Supplemental DEIS.

TCS-4

Timber Supply

Once again, the timber supply discussion is smoke and mirrors. The contractor did a full-stick multi-entry layout plan (MELP), based on the TLMP Draft Rev suitable-available timber base of 39,344 acres. Next, the contractor analyzed the MELP and found only 335 units could be implemented at this point in time. On pp 2 of Chapter 2 it states, "Based on ground verification, 85 [of the 335] units were deferred or eliminated from consideration... In addition, the boundaries of most units were modified (generally the units were made smaller)..." .

Amazingly, none of these site specific results are quantified in this document. The next document arising out of this NEPA process needs to answer these questions:

1. How many acres of units were identified in the MELP from the 39,344 acres of TLMP Draft Rev suitable-available?
2. How many acres of the MELP are within the old-growth retention strategy (Ch 4 pp 126) and won't be available for logging?
3. How many units were found to be grossly uneconomical, e.g., the Winter Harbor offering?
4. How many acres were in the originally identified 335 units?
5. How many acres did these 335 - 85 = 240 units shrink to after boundary establishment on the ground?
6. Because the contractor was largely concerned with the perimeter of the units, how much additional acreage will be deleted during full-blown layout?

3

Responses to Tongass Conservation Society

TCS-4

The concerns regarding falldown and resource sustainability are noted. The SDEIS addresses the issue of cumulative timber harvest within the project area, based on the current Forest Plan (1997 TLMP Revision) and the currently implemented standards and guidelines. The SDEIS also addresses cumulative effects of timber harvest on old-growth habitat and wildlife to the year 2054.

Field verification was conducted for harvest units and roads proposed under the Control Lake sale. Project-specific information on streams, soils, timber, and logging system feasibility was used to provide reliable estimates of timber available during this sale. This project-specific information was provided, along with information from other project areas and with the results of the Ketchikan Area LSTA Update (conducted with the Control Lake EIS), to the TLMP Revision Team for use in developing alternatives for the 1997 Forest Plan Revision. Chapter 2 of the SDEIS provides new information regarding the falldown questions asked in this comment.

Both falldown and interim changes in land use affect the timber harvest rates established in the Forest Plan. Because these factors occur at the Administrative Area and Forest-wide level, as well as the project level, they cannot be completely addressed within a project-level EIS. The Control Lake sale will contribute a small proportion of the scheduled harvest for the project area. Thus, the issue of timber supply across a broad regional area must be addressed at the Forest Plan level.

The National Forest Management Act regulations require that Forest plans be revised on a 10 to 15 year cycle to adapt to changing public views, resource uses and demand, and natural resource knowledge. The Forest planning process is used to address resource issues, land use demands, and changing land use policies. Such changes are then reflected in the acres and Allowable Sale Quantity available for harvest in the future.

The 1997 TLMP Revision and supporting documents address in detail the issues of long-term timber supply, sustainability, and effects to community stability. New estimates of timber supply are included, reflecting analysis of falldown factors, changes in

Comments of Tongass Conservation Society

TCS-5 The answers to these questions lead to a process called Validation Monitoring (Ch 2 pp 43), which is strikingly absent from this document. Instead, despite all the site specific evidence that the contractor found much of the Control Lake timber base to be unsuitable for logging, Table 3-13 (Ch 3 pp 55) concludes that all the TLMP Draft Rev suitable-available is loggable. But when it comes to estimating remaining timber supply, Table 4-36 (Ch 4 pp 79) plays switcheroo and uses the TLMP 1979 suitable-available (57,772 acres), which undeniably schedules logging in areas (beach fringe, estuary buffer, proposed Wild & Scenic River corridor, etc.) which contradict the Standards and Guidelines adopted by the Control Lake DEIS.

It is not helpful to fail to divulge site specific information (MELP results) and then confuse the public with TLMP Draft Rev acres in one place and TLMP 1979 acres in another. The Forest Service knows how to do good science, and this isn't it.

TCS-6 TCS challenges the use of the 15.3% falldown factor in Table 4-37 (Ch 4 pp 80). This factor was developed by the as-yet unpublished Control Lake Cumulative Effects Analysis and has been incorporated in several recent EIS's, including CPOW DSEIS, Lab Bay, and now Control Lake. According to the explanation in the Draft Supplement to the CPOW FEIS, this 15.3% factor is a composite of 0.4% planning falldown and 14.9% implementation falldown. Some of the fallacies of this factor include:

1. The 0.4% planning component was an apples-oranges fabrication of MELP results, which identified 71,410 acres of cutting units (this total includes units on State and Native select lands) within the 114,260 acres of TLMP Draft Rev timber base. The "analysis" then incorrectly divided the MELP results by 71,666 acres of TLMP 1979 timber base, i.e., (71,666 - 71,410) / 71,666 = 0.3%. The actual result is (114,260 - 71,410) / 114,260 = 38%.

2. The 14.9% layout component failed to consider falldown during field recon, prior to layout, and also failed to consider premature logging of areas beyond the ROD boundaries, which were planned for future timber entry (unit expansion).

3. The "analysis" failed to account for falldown for economics, falldown for non-clearcut silvicultural systems, falldown for withdrawals from the timber base as land use allocations are brought into compliance with the NCRPA, NFMA, et al., and higher falldown in the future as more difficult logging chances are explored.

4. Finally, the factors were combined mathematically incorrectly.

The summary of the Irland Group's Report (Ch 4 pp 83) is

Responses to Tongass Conservation Society

TCS-4 (cont.) land use planning, and economic considerations. Specifically, the 1997 TLMP Revision incorporates the Ketchikan Area Update. This update reflects new information about streams, slopes, soils, and operability ratings as well as karst vulnerability ratings. New land use designations and conservation biology strategies are also incorporated in the 1997 TLMP Revision. Future harvest projected in the TLMP Revision reflects adjustments for various types of falldown factors based on recent field investigations for timber sale EIS's, including adjustments for alternative, non-clearcutting harvest methods. The TLMP Revision presents the best available assessment of future timber supply for the project area and the Tongass National Forest as a whole.

TCS-5 The discussion of falldown and timber supply has been revised in the SDEIS to tie closely to the 1997 TLMP Revision. In addition, greater detail regarding the Control Lake project falldown and LSTA is provided in the SDEIS. The issues associated with falldown and timber supply are primarily Forest Plan-level issues and are addressed in the SDEIS only as they apply to cumulative effects.

TCS-6 Refer to response to TCS-5.

TCS-7 Refer to response to TCS-4.

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TCS-6 (cont.) incorrectly stated at 23%. Actually, the IGR estimated falldown at 44%, after dismissal of their "Better Response Data" and "Higher Harvest Volume" factors by the Forest Service (Evaluation of the IGR, April 1992, pp 7). In evaluating this report, the Forest Service itself stated "We agree that significantly less timber is likely to be harvested than is permissible under the ASQ's of the [TLMP] revision", and quantified this falldown at 31%. So why does Control Lake insist falldown will run less than half of the Forest Service's own previous estimate?

TCS-7 Even flow of project area timber supply should not be calculated using a 100 year rotation. The TLMP Draft Rev is very clear that rotations on the Ketchikan Area are expected to be in the 90 - 130 year range. The average stand in the suitable-available base has a site index = 70, which implies approximately a 130 year rotation before it achieves a minimum 90% culmination of mean annual increment (the EARLIEST age at which logging is permitted under NFMA). Consequently, 100 years is too small a divisor. It's interesting to note that the average tree in this average site index = 70 stand is expected to have a dbh = 10.8" at 100 years and a dbh = 13.1" at 130 years.

TCS-8 TCS has closely monitored falldown and logging outside the ROD boundaries of cutting units on the Ketchikan Area (unit expansion). Recently, the "Unit Change Analysis" monitoring reports have been modified to exclude quantification of unit expansion, for the presumed purpose of intentionally understating falldown. A January 1995 GAO report found "...41 instances in which boundary changes had occurred in areas harvested by KPC and found that in 39 instances the documentation was not adequate". This report concluded "GAO recommmends the Secretary of Agriculture direct the Chief of the Forest Service to require the Alaska Regional Office officials to periodically check to ensure that Forest Supervisors are properly documenting the environmental significance of boundary changes to timber harvest units made after the EIS's have been issued." TCS requests that any logging outside the Control Lake cutting units be clearly quantified on monitoring reports, so that falldown can be more accurately analyzed.

TCS-9 TCS also requests that all areas 'deferred' from logging during planning, layout, and administration be formally deleted from the TLMP timber base. If these deferrals can't be logged now, at a time when the Forest Service is undeniably in a desperate struggle to find timber and has just spent millions of dollars gaining NEPA clearance, then TCS challenges that these 'deferrals' will likely NEVER be logged. Please remove them from the Tongass timber base, so they don't just sit there and grind out phony ASQ's which falsely justify unsustainable logging levels.

TCS-10 Ever since TLMP's unachievable timber estimations became a significant issue on the Tongass, the Forest Service has persisted in a hide-the-ball approach to downplay the unavoidable fact that current harvest levels are unsustainable in the long-term. Control Lake represents yet another link in this continuing chain of

Responses to Tongass Conservation Society

TCS-8 Refer to response to TCS-4. The Forest has established a change analysis procedure that documents the differences between planned unit boundaries and the final location of unit boundaries. The change analysis process is conducted for all units during implementation.

TCS-9 Refer to response to TCS-4.

TCS-10 Refer to response to TCS-4.

TCS-11 We disagree with the statement that all alternatives in the DEIS

Comments of Tongass Conservation Society

TCS-10 (cont.) denial. The Tongass is only in the 40th year of a supposed 100 year rotation, and ALREADY the Forest Service is scraping the bottom of the barrel to come up with enough timber to meet targets which it claims are sustainable. TCS requests the Forest Service tell the truth on this issue.

Proportionality

TCS-11 Every one of the action alternatives fails to meet the Forest Service's own policy for proportionality (FSH 2409.18 R-10 Supp 2409) by exceeding the 0.5% tolerance for decrease in high volume proportion in a Management Area. In addition, the 0.5% tolerance is not even applicable for the Control Lake project because "The Ketchikan Area 10-year sale program however, does not project a second entry into the Control Lake project area before 2004" (Ch 4 pp 79). Consequently, there is no opportunity before the end of the long-term sale to fix ANY proportionality departure in this project area.

TCS concludes all the action alternatives analyzed in this DEIS are infeasible from a proportionality standpoint and asks the Forest Service to reissue this document with different alternatives.

TCS-12 Economics

The economics of this sale are horrible. The proposed action, logging 187 mmbf while constructing 169 miles of new road (Ch 1 pp 2), has an abysmally low mmbf/mile ratio. While each alternative shows a positive stumpage using the relatively high selling values currently prevailing, historically every one of these alternatives is a loser. The very best of the action alternatives has a mid-market stumpage value of NEGATIVE $128.05 per mbf. The Winter Harbor area, in particular, is negative for both mid-market and current-values appraisals for all alternatives. TCS asks that the Winter Harbor offering be deleted from further consideration in this project and be removed from the Tongass timber base. TCS also notes that only the mid-market analysis is authorized to drop purchaser Profit & Risk to 60% of Normal and requests the current-values appraisal be amended to show full Profit & Risk.

It is important for the public to be advised of the true cost of a project of this nature. Please clearly state how much this environmental analysis contract is expected to cost, as well as how much additional the Forest Service has spent to advertise, procure, and administer this contract. Table 4-71 (Ch 4 pp 149) should be amended to include this NEPA cost, as well as payments to the State of Alaska; Table 4-71 should also be duplicated to display PNV associated with mid-market values.

TCS-13 Community stability

Table 4-39 (Ch 4 pp 82) states that overall logging levels on POW can be maintained into the future pretty much at historical rates. i.e., 5,066 ac/yr (historical) vs 4,978 ac/yr (future). The

Responses to Tongass Conservation Society

failed to meet the proportionality requirement. For Management Area K08 all alternatives improve the proportion of high volume stands remaining in the Management Area upon completion of harvest, and all are within the proportionality requirement. Management Area K14 is currently out of compliance with the base proportion. All alternatives, except Alternative 4, improve the proportion of high volume stands remaining in the Management Area upon completion of harvest. Alternative 4 harvests 62 acres of high volume stands beyond the existing proportion of the Management Area. For Management Area K15, only Alternative 2 proposes harvest that would move the Management Area out of compliance with the base proportion.

Proportionality was calculated for the Control Lake DEIS using the approved procedure available at that time. The methodology is described in Forest Handbook Supplement No. 2409.18-93-3, dated August 15, 1993. The proportionality clause of the Tongass Timber Reform Act is intended to "eliminate the practice of harvesting a disproportionate amount of old-growth timber by limiting the volume harvested over the rotation in volume classes 6 and 7...". The intent of the Forest Service is to require that Management Areas be in proportion by the end of the rotation. The Forest Service allows a 0.5 percent departure from the base proportion during an individual sale offering, if there is an opportunity to achieve the base proportion through future offerings.

Table 4-29 and Table 3.6-10 (Appendix B) in the DEIS show the number of acres that would need to be harvested in order to return to the base proportion for each alternative.

It should be noted that a Forest Service review of alternative methodologies led to development of a transition method that converts acres to volume based on timber inventory statistics. The transition method can be applied where adequate information is available. The results of this method are shown for the alternatives in the DEIS.

Note that all project volume is now planned for the independent sale program. Therefore, proportionality is no longer an issue.

Comments of Tongass Conservation Society

TCS-13 (cont.) implication here is that some forest worker in, say Coffman Cove, will think nothing of commuting to South POW or else spike out of logging camps there. The fact is that 35% (TCS has heard 50%) of all workers in remote logging camps are non-residents of Alaska. What this indicates is that there is going to be a lot of out-of-work loggers in established POW communities because the Forest Service permitted these people to log themselves out of a job, all the while telling them that the logging they were doing was sustainable. TCS wonders if this could be the basis for a class action lawsuit because the Forest Service failed to enforce long-term contract clause B0.14 which states, "...labor for the conduct of logging operations...will be recruited from residents of SE Alaska."

TCS-14 Tongass-wide logging levels are based upon the assumption that it will be economical to enter some of the as yet undeveloped areas. However, many of these areas, e.g., Cleveland and South POW, may never see timber selling values soar to the level which would make them economical to harvest, at anything other than apocalyptic, one-shot-takes-it-all entries (if even then). Indeed, even northern Prince of Wales Island itself might not have been economical to log in the first place, if the Forest Service hadn't received a massive infusion of TTF funds to 'hard-money' in the infrastructure necessary to support the logging, i.e., roads, LTF's, etc.

The former TLMP team leader wrote on August 21, 1991, "A significant portion of the suitable-available acres being considered in the paper harvest-transportation planning process are in the difficult and isolated operability. Without an aggressive augmentation or pre-roading program [read: subsidy] or a substantial change in market price, the difficult and isolated operability acres can't even be considered in any project alternative. This essentially reduces the suitable-available base by 1/3, limiting choices to the normal operability. Continuing to focus on the normal operability aggravates the economics of future entries."

TCS-15 Consequently, the Forest Service is finding it necessary to return to the scene of the crime, as it were, and plan additional logging in developed areas which have already been hammered. Unfortunately, established communities adjacent to these developed areas need these local timber supplies to be sustainable far into the future, if there is to be any hope for perpetuation of a wood products industry on POW. The Citizens' Alternative provides a wonderful commentary on what is necessary to preserve community stability. There is a great lesson to be learned from the failure of the Forest Service to even consider this alternative in detail.

TCS-16 Air and water quality

Sale of Control Lake timber to KPC continues operation of what TCS believes to be the worst single source of pollution in the Pacific Northwest. Adjacent to the mill, anecdotal accounts abound of galvanized water tanks rusting, rampant cancer rates, and

Responses to Tongass Conservation Society

TCS-12 An economic analysis of the proposed timber harvest is presented in the Economic and Social Environment section of Chapter 4. This analysis includes both a mid-market analysis and a current values analysis. The analysis is used to determine financial efficiency for comparing between alternatives. It is important to recognize that the revenue and cost estimates used (which generally are regional averages with some adjustment for local conditions) represent very preliminary estimates of future timber sale revenues and costs. Prior to the time each sale is offered, each unit and road will be cruised to better determine the quantity, quality, and value of timber. A formal appraisal and timber sale report will be prepared incorporating current quarter selling values and cost information plus a normal profit and risk margin.

An error was discovered in the costing of the Winter Harbor area roads in the DEIS. This error has been corrected in the SDEIS and the result is that the Winter Harbor financial efficiency is within the range of the other areas.

The total cost of the Control Lake portion of the contract with Foster Wheeler Environmental Corporation will be a little over $4 million. This sum includes the EIS and all supporting studies. It should be noted that many of the supporting efforts provide resource and planning information that is useful and will be used for future projects and for long-term planning for this area. These efforts include the logging system and transportation analysis, the timber cruise, northern goshawk and marbled murrelet surveys, the watershed analyses, the cultural resource inventory, the landscape analysis, and many other resource analyses.

TCS-13 We do not understand how maintaining timber harvest levels into the future indicates that there is going to be a lot of out-of-work loggers. It is clear that loggers on Prince of Wales Island will need to be mobile if harvest levels are to remain constant and the current number of logging industry jobs is to be maintained. This issue is a Forest Plan-level issue and is addressed in the Communities section of the 1997 TLMP Revision EIS.

TCS-14 The comment identifies issues addressed at the Forest-wide level. Refer to the 1997 TLMP Revision EIS for a discussion of these

Comments of Tongass Conservation Society

TCS-16 (cont.) homeowners trying to rent their homes so they can flee the mill area and move to town. Ward Cove is worse than a cesspool. KPC has already been convicted of felonies in connection with this unlawful discharge. KPC's sister operation in Sitka, the now defunct APC mill, is currently being evaluated for Superfund Site status.

TCS reminds the Forest Service of its obligation to enforce long-term contract clause B0.12 which states, "The Purchaser shall make such showing as may be required by the Chief, Forest Service, in respect to adequate measure for control of disposal of plant effluents..." TCS requests that air and water pollution caused by continued operation of the KPC mill while processing project area timber be elevated to a significant issue in the Control Lake Supplemental DEIS.

TCS-17 Subsistence

The Elevenmile Area (aka Western Peninsula) is particularly important for subsistence and cultural identity. Please delete further consideration of logging in this area and remove these lands from the Tongass timber base.

Wildlife and Recreation

TCS-18 TCS represents many individuals who recreate in Honker Divide and who believe that this area's long-term value to the SE Alaska lifestyle and economy will be compromised if it is opened to more logging. TCS also agrees with the ADF&G determination that this is some of the most significant fish and wildlife habitat remaining in SE Alaska. The Forest Service must know that logging in the Honker Divide will be opposed, but really doesn't have any other place to go. This lack of options should not be occurring so soon, given the Tongass is only in the 40th year of an alleged 100 year rotation. TCS asks deletion of further consideration of logging in this area and removal of the Honker area from the Tongass timber base.

TCS-19 In reviewing the Wildlife and Biodiversity sections, there is seemingly no specific proposal for Old-Growth Retention areas, other than a confusing reference to Figure 2-1. The existing TLMP requires that these areas be identified in site specific NEPA projects. TCS did not like the treatment of Old-Growth Retention in North Revilla and CPOW where the extent and location of these areas was not displayed until the ROD. Because of the disasterous effects upon wildlife habitat caused by the unsustainable level of logging, it is critical that these areas be identified in the DEIS, so that the public can review and comment upon them. TCS asks Old-Growth Retention Areas be clearly mapped in the Control Lake Supplemental DEIS.

TCS-20 Projected reductions in deer habitat capabilities is particularly disturbing, if these reductions indeed translate to fewer animals. While it is now unalterable that this downward spiral started from past logging, it is unconscionable to allow the further demise of the deer population by continuing to hammer this area with massive

Responses to Tongass Conservation Society

issues.

TCS-15 Comment noted. Please note that Alternative 10 has been moved into the main text in the SDEIS.

TCS-16 See response to SEAC-11.

TCS-17 Your comment is noted. Of the alternatives being considered in detail, Alternative 11 does not include any road construction within 3 miles of the Elevenmile shoreline and Alternative 10 does not include any road construction within 5 miles.

TCS-18 Alternatives 2 and 7, which entered the Honker Divide area to the highest degree, have been eliminated from detailed consideration. The alternatives under detailed consideration in the SDEIS, all avoid the Honker Divide area to varying degrees.

TCS-19 Old-Growth Habitat areas have been incorporated into the 1997 TLMP Revision as LUD's and are mapped in the Control Lake SDEIS.

TCS-20 Habitat capability models estimate habitat quality but do not predict actual population levels. Populations are frequently above or below habitat model predictions at given points in time for a multitude of reasons including weather, and hunting and trapping pressure. The habitat capability models are intended to provide a relative comparison between alternatives of the effects of the proposed action to habitat. The Federal Subsistence Board considers input from subsistence users, past harvest levels, hunter success rates, and other information, including habitat capability models, in managing subsistence resources on federal land.

TCS-21 The Control Lake project includes many of the components of ecosystem management, from the landscape level with landscape

Comments of Tongass Conservation Society

TCS-20 (cont.) projects like Control Lake. Further decline in deer habitat and populations is unacceptable. The term 'minimum viable populations' does NOT apply here. Deer is a species which needs to be maintained at huntable populations -- both for subsistence and sport hunters.

For years, the Forest Service has defended its assault on Prince of Wales Island by pointing to all the roads that have been built and claiming what an attraction they are to off-POW recreationists. Reduce deer populations to the point where sport hunting is banned on POW and see how much attraction these wonderful roads provide.

TCS-21 Ecosystem management

This document seems to relegate ecosystem management to '101 ways to disguise a clearcut and maybe leave a little stringer of timber between areas that were infeasible to log'. The fundamental truth here is that conversion of a landscape composed of old growth to a landscape composed of second growth is the antithesis of ecosystem management. In fact, it is ecosystem alteration to the nth degree. Conversion of old growth to second growth creates a landscape which is dysfunctional to its most important user group -- loggers and other old-growth dependent species.

TCS recommends the entire project area be managed on a minimum 250 year rotation, the age at which most scientists agree that SE Alaska forest START to exhibit old-growth characteristics. Otherwise, this represents an irreversible, irretrievable commitment of resources on a landscape level, which transcends the ability of science to analyze at this time.

TCS-22 Summary

TCS has watched the Forest Service struggle to attempt to meet the demands of the long-term contract and the agency's slow renaissance to the fact that continued execution of this contract runs contrary to precepts of National Forest stewardship, as well as most environmental laws. Control Lake represents another painful step in this struggle and renaissance.

In reviewing this DEIS, there are many areas where the opinions of TCS differ from those presented. This is to be expected. More troubling, however, are areas where it appears truth, objectivity, and law/regulation have been compromised in an attempt to understate environmental consequences in order to facilitate pre-ordained decision-making. TCS opposes these 'more troubling areas' and looks for their resolution in a reissue of this DEIS. Thank you for the opportunity to comment.

Sincerely,

Bill Shoaf
Conservation Forester, TCS

7

Responses to Tongass Conservation Society

management zoning and an old growth retention strategy, to the stand level with nine different harvest types. With these ecosystem management components, a minimum 250 year rotation is not necessary for the project area, and would not be in agreement with the Forest Plan.

TCS-22 Your comment is noted; however, we strongly disagree that truth and objectivity have been compromised in order to understate environmental consequences.

Comments of Paul Barnes

DEC-26-95 TUE 21:19 BRAKEL/STEVELER 907 697 2287 P.03

26 DEC '95

Dear Bradley Powell, Forest Supervisor –

PB-1 I am writing to inform you that I ~~have~~ support the citizens' alternative (Alt. 10) for the Control Lake timber sale. It should be the selected alternative in the final decision. Also, it is

PB-2 inexcusable to do any logging in the Honker Divide or Elevenmile Peninsulas. The importance of these areas as pristine, unlogged wilderness is obvious. Please stay out of these two areas. This sale provides a golden opportunity for the Forest Service to show the public (whom they serve) that they care about all users of the Tongass, not just the pulp mill. Thank you.

Paul Barnes
Box 155
Gustavus, AK. 99826

Responses to Paul Barnes

PB-1 Comment noted.

PB-2 Comment noted. Please note that the KPC Long-term Contract is no longer related to the Control Lake project. Also note that each of the action alternatives in the SDEIS avoid harvest activity in the Honker Divide and Elevenmile areas from partly to completely.

Comments of Terry Benjamin

December 21, 1995

Mr. Brad Powell
Forest Superviser
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I have lived and worked here in Southeast for several years. My family and I enjoy the beauty of Southeast and love to camp, hunt, fish, and hike in the area. Being employed by KPC, we are dependant on the timber industry for our living. I am a strong believer in conservation and sound multiple use forest management practices. However, I do not agree with the conservation groups agenda to eliminate logging on the Tongass.

TB-1 | I support Alternative 2, which harvests 233 million board feet of timber. I do not believe Habitat Conservation Areas should be
TB-2 | implemented. I believe there are enough areas that can never be logged to provide for the preservation of plant and wildlife concerns. I do support stream buffer strips and the Honker Divide
TB-3 | Area buffer zone that is already in place, but do not support further restrictions.

TB-4 | I also believe that timber harvest is beneficial to wildlife, in that it opens up new forage areas. Is it not true that studies have been done to prove that clear-cutting actually increases deer populations? If the Tongass is on a 100 year rotation then there should always be sufficient old growth, 2nd growth, and clearcuts to sustain a viable population of most any specie.

TB-5 | I believe logging provides the road system to open more of the forest to public use for all groups.

Thank you for considering my concerns in your Tongass management efforts.

Sincerely,

Terry Benjamin
Box 5481
Ketchikan, AK 999901

Responses to Terry Benjamin

TB-1 Comment noted.

TB-2 Comment noted.

TB-3 Comment noted.

TB-4 Clearcuts typically provide high deer forage levels for about 25 years after harvest in Southeast Alaska. After this period the young second-growth canopy usually closes in so tight that deer forage plants are shaded out and forage production drops off markedly without intermediate stand treatments. These second-growth stands remain in a relatively non-productive stage for deer until towards the end of the rotation when the canopy begins to open up again. In addition, although clearcuts typically have high forage production, the availability of forage may be low during severe winters when snow depths bury forage plants or make deer movements difficult in the open clearcuts. During these critical periods for deer, old-growth or mature forests are usually sought out because they provide some forage and have lower snow depths than open areas due to snow interception by the forest canopy.

TB-5 Comment noted. As noted in the SDEIS, additional open roads provide benefits to some members of the public and negatively affect others, as well as many species of wildlife.

Comments of Jill Bennett

12/21/95

Brad Powell
Forest Supervisor
USDA Forest Service - KMD
Federal Building
Ketchikan AK 99901

Dear Brad

I would like to take a moment to comment on the Control Lake DEIS.

JB-1 I believe the preferred alternative for this sale should be alternative 2. This alternative harvests the most amount of timber while staying within the standards and guidelines of the forest plan.

JB-2 As a resident and recreational enthusiast of Southeast Alaska I feel this timber sale will be a big boost to the employment and economy of this area while having virtually no adverse impact on the environment.

While I realize timber harvest is

Responses to Jill Bennett

JB-1 Comment noted.

JB-2 Comment noted.

Comments of Jill Bennett

JB-2 (cont.)

not a popular activity in this area these days as far as the preservationists are concerned I feel timber harvest is a vital activity to this area and if I have to make a choice to preserve something I would prefer to preserve the people, their jobs, the economy, and a way of life.

JB-3

I also feel that Habitat Conservation Areas are unnecessary and should by no means be implemented as part of this sale. I was once told that the best environmentalist one will ever find is a logger because he is not going to intentionally ruin his environment and I believe this to be true.

Thank you for your time and this opportunity to comment.

Jill L Bennett
Box 1043
Ward Cove Ak 99928

Responses to Jill Bennett

JB-3 Comment noted. Please note that a new Forest Plan Revision has recently been adopted which incorporates a series of Old-Growth Habitat areas. The Control Lake project area includes a number of these reserves; harvest cannot take place within them without a Forest Plan amendment.

Comments of Paul N. Berry

Paul N Berry
PO Box 143
Gustavus, AlaskA 99826-0143
(907)697-2367

December 19th. 1995

Bradley Powell
Forest Supervisor. Ketchikan Area
Federal Building
Ketchikan, AlaskA 99901

Re: Control Lake EIS

Dear Mr. Powell:

PNB-1 Hello. I received a copy of the Control Lake DEIS, all 5 pounds of it. I had heard about the Citizens' Alternative and was pleased to see it in there. However I was angered with the fact it was not one of the final alternatives.

Why doesn't the Forest Service act on the Citizens' initiative? Surely the folks who live in that area and base their livilihoods there are going to have a good idea on how to best manage a resource for conservation and for timber production. They jumped all the hoops and provided all the numbers to back up their proposal. Why snub their efforts because it won't meet an unsustainable timber harvest quota set by KPC and Senator Stevens in Washington D.C.?

I would like to see the Forest Service take a stand and defend and support truely sustainable logging on Prince of Wales Island.

Please send me only the summary of the final EIS.

Sincerely.

Paul N Berry

Responses to Paul N. Berry

PNB-1 Please note that Alternative 10 is now included in the SDEIS as one of the alternatives for detailed consideration.

Comments of Mitchell D. Bethel

December 20, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska, 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I have lived in Southeast Alaska for a number of years. I fish, hunt, tour, and work in the timber industry. I am glad to have this great opportunity. Where else in America can you do all of these activities in one place. I am writing you today because I feel that my way of life and this opportunity is being taken from me. I am supported by the timber industry. The timber industry gives me the resources necessary to fish, hunt, and recreate where I live. The timber industry has built the infrastructure required for our communities to grow and provide other opportunities like shopping and dinning.

The timber industry continues to expand the opportunities and make the forest more accessible to other people as well. I feel that there is room for everyone in this great forest.

MDB-1 | I support logging the maximum volume of timber from the Control Lake planning area as possible under the current forest plan.

Help protect my way of life.

Sincerely,
Mitchell D Bethel
Mitchell D Bethel

Responses to Mitchell D. Bethel

MDB-1 Comment noted. The issues you raise are addressed in general in the 1997 TLMP EIS and specifically for this project in the Control Lake EIS.

Comments of Judy Brakel

Page 1 of 2

Gustavus, Alaska
Dec. 26, 1995

Bradley Powell, Forest Supervisor
Ketchikan Area, Tongass National Forest
Ketchikan, Alaska

Re: Comment on Control Lake Draft EIS
Dear Mr. Powell:

JB2-1 I am surprised, in fact shocked that you did not seriously consider the Citizen's Alternative (Alternative 10). This alternative was supported by resolutions of the Craig and Klawock City Councils, the Craig and Klawock tribal governments, and the Haida Tribe in Hydaburg. A huge amount of community and citizen work went into developing this Alternative. Unlike the preferred alternative, the Citizen's Alternative also fulfills many requirements of good forest management:
- It is the only timber sale in the DEIS with a positive net financial return to the U.S taxpayers;
- It avoids logging and roading in the heart of the Thorne River-Honker Divide area, an area that is valued locally and nationally for its rich fisheries, wildlife and scenic values;
- It stays out of the Eleven mile Peninsula, an important subsistance hunting, fishing and gathering area for the people of Craig and Klawock;
- It provides timber for sale to small timber operators and the possibility of a value added local forest products industry.

I ask that the Citizen's Alternative be selected for the Control Lake Timber Project.

JB2-2 In the late 1050's or early 1060's my father did his best to use federal navigation laws to prevent logging from occuring in the northern part of the Honker Divide lake and river system. We lived in Petersburg and visited that area aboard our 32 ft. boat, and further inland by skiff. He recognized then the great value of the area and the threat that logging would pose. Without any help from lawyers (Petersburg had none), he used his knowledge of existing navigation law, theorizing that under the logging practices of the time, clearcutting would create enough siltation to convert parts of that lake system that were then navigable to a non-navigable condition, which he believed was illegal. So I feel a special interest in protecting this area - (as my father would say) "Damn it!"

JB2-3 One of the failings of this Draft EIS is that it does not consider any of the problems identified in the *Report to Congress: Anadromous Fish Habitat Assessment*. This is the Forest Service's own assessment of the shortcomings of present fish habitat protection measures. **The selected alternative must include the additional protections recommended in that report.**

JB2-4 The recommendations for protecting wildlife embodied in the *Viable Populations*

Responses to Judy Brakel

JB2-1 Alternative 10 is now included in the main text of the SDEIS. See response to SEAC-6.

JB2-2 Comment noted.

JB2-3 The Control Lake project does include protections as recommended in the AFHA report. Refer to the responses to SEAC-26 and SEAC-36.

JB2-4 Current and future timber sale planning on Prince of Wales Island follows the direction provided in the Forest Plan Revision (1997). The 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining viable, well-distributed populations of wildlife species on the Tongass.

Also, refer to the response to SEAC-17.

Comments of Judy Brakel

Page 2 of 2

JB2-4 (cont.) *Strategy* must also be followed, or some equally viable alternative method employed for maintaining viable and well-distributed wildlife populations, as required by the National Forest Management Act. Moreover, people in Alaska want not only viable populations, but huntable populations of some species, especially deer. Protection of huntable populations is required by the portions of ANILCA pertaining to subsistance.

Thank you for this opportunity to comment. I hope it was worth doing.

Yours truly,

Judy Brakel

Judy Brakel
Box 94, Gustavus, Alaska 99826

Responses to Judy Brakel

Comments of Gerald R. Brookman

GERALD R. BROOKMAN
715 MUIR AVENUE
KENAI, ALASKA 99611

December 26, 1995

By FAX To:

Bradley Powell, Forest Supervisor
Ketchikan Area, Tongass National Forest

Phil Janek, Regional Foreater
Tongaas National Forest

Dear Sira:

The following are my comments on the Draft Environmental Impact Statement on the Control Lake area timber plan.

GRB-1 Firat, I strongly urge that the alternative adopted be Alternative 10, the "Citizens' Alternative", as advocated by the Prince of Wales Citizena' Coalition.

GRB-2 Second, I strongly recommend that NO logging be permitted in the Honker Divide and Elevenmile Peninsula areas. These areas are much too important as wildlife habitat, watershed, and recreational areas to allow logging there. To do so would be a travesty of the Forest Service's multiple use policies, in that it would allow only one dominant use, logging, to the exclusion of other, in this case more important, uses.

GRB-3 Third, I want to say that I am strongly opposed to management of the Tongass or of any other National Forest or other public lands which would sacrifice long term, continuing benefits to the public to short term economic gain to the treasury. In fact, such short term economic benefits are frequently illusory, in that they do not take into consideration many of the associated costs. It is simply WRONG to deprive the public, who are the owners of our National Forests and other public lands, of the benefits of protecting these areas for public use by all Americans for the sake of the economic benefit of a few, particularly considering that even the economic benefits are frequently at a net loss to the federal government due to costs of sale administration, road building, etc.

GRB-4 Fourth, I demand that the Forest Service fully carry out all legislative and administrative mandates to protect the very important fish and wildlife resources of Prince of Wales Island: deer, bears, wolves, salmon, steelhead, and other species whose habitat would be destroyed or severely damaged by any logging in this area. The Forest Service should fully implement the best scientific recommendations, based on the best and most objective information available, including the Viable Wildlife Population Committee Report and it's Peer Review and the Anadromous Fish Habitat Assessment. No amount of economic gain, which in fact is very likely to be a net economic loss to the federal government, should be allowed to over-ride the importance of the Honker Divide and Elevenmile Peninsula areas, and adjacent parts of Prince of Wales Island, as wildlife habitat.

Sincerely,

Gerald R. Brookman

Responses to Gerald R. Brookman

GRB-1 Comment noted. Alternative 10 has been moved into the main text in the SDEIS.

GRB-2 Comment noted. All of the action alternatives included for detailed analysis in the SDEIS avoid the Honker Divide and Elevenmile areas to varying degrees.

GRB-3 Comment noted. Please note that the Control Lake sale is designed to implement the Forest Plan. For the DEIS, the purpose and need was also to supply timber to both the independent sale program and the Ketchikan Pulp Company under the long-term contract. The current purpose and need no longer includes the provision of timber under the long-term contract. Further, the range of the current action alternatives is quite broad, extending from 38 to 123 MMBF in terms of timber volume.

Note also that short-term economic gain to the treasury is not a major consideration in the evaluation of alternatives. Of greater concern are the economic effects on local community stability and all of Southeast Alaska, and the effects on natural resources.

GRB-4 An ecosystem management approach was used in the planning of the Control Lake timber sale. This approach is maintained in the SDEIS (see Chapter 2 and the Biodiversity section of Chapters 3 and 4). After extensive evaluation, the new Forest Plan (1997) incorporates a wildlife habitat conservation strategy similar to the one developed by the Interagency Viable Population Committee (considering the results of the Peer Review) for maintaining viable, well-distributed populations of wildlife species on the Tongass. The Control Lake SDEIS includes action alternatives that fully implement this strategy.

Site-specific mitigation measures applied to the Control Lake harvest units are in accordance with the increased mitigation recommended in the Anadromous Fish Habitat Assessment Report (see response to SEAC-26). Harvest units proposed for

Comments of Gerald R. Brookman

Responses to Gerald R. Brookman

GRB-4 (cont.)

the Control Lake project were field-verified by resource specialists, who designated sites for implementation of required mitigation measures. Specialists were given the authority to recommend mitigation measures beyond those required by TTRA, BMP's, and minimum measures identified under Forest Plan standards and guidelines. These additional measures included: extending no-harvest buffers to include adjacent floodplains, muskegs, or forested habitats for protection of wildlife/fisheries/water quality; specifying selective harvest or individual tree harvest buffers or partial harvest of the entire unit to reduce blowdown potential and for protection of wildlife/fisheries/water quality; and specifying split-yarding and/or full suspension and prescribing no-cut buffers on Class III streams and V-notches where appropriate to protect water quality.

Comments of Robert G. Bucknell

December 21, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska, 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

RGB-1 First of all I would like to thank you for the opportunity to comment on the Control lake planning process. I am a life long resident of Southeast Alaska which amounts to almost forty years. Since my early adolescence I have enjoyed hunting, fishing, touring and camping in this great land that makes up the Tongass National Forest. I have been employed in the timber industry for almost nineteen years and thoroughly enjoy the life I have become accustomed too. The timber industry has built the infrastructure of many of the communities in Southeast Alaska and these communities could suffer grave damages if the timber industry's operations were curtailed any farther than it already has been. In all of my years doing the activities that I enjoy I have yet to see proof that logging has any detrimental effect on the deer population in fact I believe that it has enhanced in by creating more foliage for the deer to browse on. Also with the buffers already in place and enforced I have not noticed any damage to the sport fishing that was directly caused by logging.

RGB-2 In closing I would like to state that I Support logging the maximum volume of timber from the Control Lake planning area as possible under the current forest plan. Once again I thank you for the opportunity to make my comments on this issue that effects my way of life that makes me feel how great it is to be an American and live in the greatest area of our country.

Sincerely, Robert G. Bucknell

Robert G. Bucknell

Responses to Robert G. Bucknell

RGB-1 Comment noted. Refer to response to JEC-1. The Control Lake project will follow the standards and guidelines established in the new Forest Plan (1997).

RGB-2 Comment noted.

Comments of Bernardo Bueza

December 20, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska, 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I am a concerned citizen who lives Southeast Alaska. Thank you for including me in the planning process, I have some comments to make.

BB-1 | First, my family is directly supported by the forest products industry. I am in support of the maximum allowable timber harvest which meets the current Forest Service Standards and Guidelines in the Control Lake Planning Area.

BB-2 | Second, I do not believe that timber harvest is harmful to deer or other wildlife. In fact I believe it may help the deer by increasing the amount of browse in an area.

BB-3 | Third, I do not believe more restrictions should be placed on the Honker Divide Area. There is already a 1 mile wide buffer zone on the system. I think that timber harvest and tourism are compatible and are mutually beneficial.

BB-4 | Finally, I think timber sales should be econonical. The Forest Service does not have to put up deficit timber sales.

Sincerely,

Bernardo Bueza

Responses to Bernardo Bueza

BB-1 Comment noted.

BB-2 Comment noted. Refer to response to TB-4.

BB-3 Comment noted. However, the 1997 Forest Plan has placed more restrictive land use designations around the Honker Divide area primarily for the maintenance of viable, well-distributed wildlife populations in the north half of Prince of Wales Island.

BB-4 Comment noted.

Comments of Betsy Burdett

Forest Supervisor
ATTN Control Lake EIS
Tongass Na. Forest
Federal BLDG.
Ketchikan, AK 99901

December 25, 1995

Dear Forest Supervisor,

BB2-1 I am writing to express my preferred choice for the Control Lake Timber Sale. I prefer the No Project Alternative, and failing that, the Citizen's Alternative which was
BB2-2 eliminated from the study. I am shocked by the introduction or even the consideration
BB2-3 of Alternative 2 both in terms of the amount of timber offered and the proximity of so many harvest units.

BB2-4 Frankly, I am surprised that more consideration wasn't taken to the citizen comments about the Honker Watershed and its protection generated from the scoping process. The effects of cutting a mature forest in these sensitive areas will threaten biodiversity and wildlife dependent on a mature forest. This claim has been substantiated by your own biologists.

BB2-5 I would like to comment that the explanation about the number of mmbf in the summary offered over three years was a bit confusing. I think it would be wise if we didn't guarantee **anyone** a specified amount of timber over any length of time as a large corporation has an insatiable appetite for timber.

BB2-6 TLMP 1991a includes provisions for scenic rivers, Research Natural Areas, Recreational Rivers, Scenic View sheds, and a provision for timber management keeping wildlife habitat in mind.

All of these provisions are strong arguments for staying out of the Honker Watershed or at the very least considering selective cutting by independent buyers.

I chose the TLMP 1991a examples because I am an individual that makes her living from recreation. The Tongass Forest has much more to offer than timber. It offers diverse potential to future generations.

Thank you for your consideration.

Sincerely,
Betsey Burdett

Box 9143
Ketchikan AK 99901

Responses to Betsy Burdett

BB2-1 Comment noted.

BB2-2 Comment noted.

BB2-3 Alternative 2 has been eliminated from detailed study in the SDEIS. Alternative 2 helped us identify the upper range of timber volume that would be available under the then current Forest Plan (1979 as amended).

BB2-4 This comment, and those of others, were considered in development of Alternative 11 for the SDEIS, which is the agency preferred alternative at this time.

BB2-5 The U.S. Government was under contract to provide timber to Kethikan Pulp Company (KPC) based on an agreement established in 1954. KPC has closed its pulp mill and the long-term contract has been mutually modified to provide timber for KPC sawmills through 1999. This means that any timber offered for sale from Control Lake will be for the independent sale program under competitive bidding. The SDEIS has been modified to reflect the new purpose and need for the project.

BB2-6 Comment noted.

Comments of Hector and Grayce Ceschi

18 December 1995

Mr Bradley Powell,Forest Supervisor
Ketchikan Area
Federal Building
Ketchikan, AK 99901

Dear Mr Powell:-

HGC-1 We have been visitors to Southeast Alaska which we find to be a most delightful and unspoiled area. It has come to our attention that the Control Lake Timber Sale is likely to impact significantly areas like the Honker Divide, and Eleven Mile Peninsula in the Tongass.

Please consider strongly the Citizen's Alternative with regard to this Sale.

We who live in California, and know Oregon and Washington pretty well, have seen what high volume cutting can do. It is something that we don't like to envision for the Tongass. It is simply one of the last treasures that the US has and every effort should be made to take care of it for the people who live there in Alaska, for the people who live in the lower 48, and for the generations yet to come.

Your concern in this matter is vitally important. Thankyou for helping to save these resources for all of us.

Very truly yours,

Hector and Grayce Ceschi

Hector and Grayce Ceschi
571 46 Avenue
San Francisco, CA 94121

Responses to Hector and Grayce Ceschi

HGC-1 Comment noted. Alternative 10 is now included in the SDEIS as an alternative for detailed consideration. All of the action alternatives in the SDEIS avoid harvest activity in the Honker Divide and Elevenmile areas from partly to completely.

Comments of Robert H. Clark

RHC-1

12/19/95

Dear Mr. Janik: RECEIVED JAN 16 1996

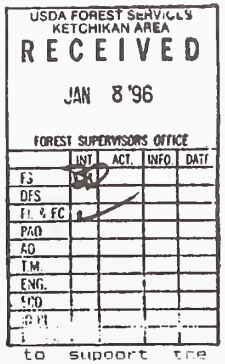
I favor alternative A of the 8/91 TLMPR DEIS for management of the Control Lake Timber Sale area rather than alternative P, the management plan proposed for the area in the DEIS of October, 1995. The theme of alternative A emphasizes "high-quality fish and wildlife habitat" and timber harvest and mining at "non-market" levels.

Sincerely,
Robert H. Clark

Responses to Robert H. Clark

RHC-1 Neither Alternatives A nor P from the 1991 TLMP SDEIS were selected for the TLMP Revision. The 1997 selected alternative in the TLMP FEIS included substantially more land, emphasizing high-quality fish and wildlife habitat where timber harvest is not allowed, for the Control Lake project area, than did Alternative P.

Comments of Florence R. Collins



P.O. Box 50
Lake Minchumina
Alaska 99757
December 20, 1995

Mr. Phil Janik, Regional Forester
P.O. Box 21628
Juneau, AK 99802-1628

Dear Mr. Janik,

FRC-1 This letter is being sent to urge you to support the Control Lake Citizens' Alternative (Alternative 10) for logging in the Honker Divide and Elevenmile areas on Prince of Wales Island. Although my home is interior Alaska, I have spent some time on the Alaska Marine Highway ferries and on cruise ships in the Prince of Wales Island area, and remember it as a beautiful place. Photographs of the Honker Divide show the inland areas are equally beautiful. There should be as little logging as possible, just enough to support local and subsistence needs.

FRC-2

FRC-3 Once an old-growth forest is cut, it is gone forever. In human terms, and the wildlife, human subsistence, and diversity of the area are destroyed, along with the financial and esthetic benefits derived from tourism and other nonconsumptive uses. Many plants are being shown to have unsuspected medicinal values; can you be sure such plants don't exist on Prince of Wales Island? If whole areas are clearcut, the chances of finding such plants, and their viability in forests that are only patches of the original forests, would be poor indeed. Surely these values are more important to the people of Southeastern Alaska, and to Alaskans elsewhere (and others as well), than quick profits for the pulp company.

Sincerely,

Florence R. Collins

cc:Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan AK 99901

Responses to Florence R. Collins

FRC-1 Comment noted.

FRC-2 Comment noted.

FRC-3 Comment noted. The purpose of this EIS is to evaluate the positive and negative effects of the project relative to the issues raised here along with others.

Comments of Jerry E. Collins

December 22, 1995

Mr. Brad Powell
Forest Service Supervisor
USDA Forest Service - Ketchikan
Federal Building
Ketchikan, Alaska 99901

Re: Control Lake Draft EIS Comments

Dear Mr. Powell,

I have lived in Ketchikan for 33 years and have hunted and fished in this area and have enjoyed and respected the outdoors for even longer.

Thanks to the timber industry I have been able to raise my family, buy a home and make use of the outdoors for recreational purposes.

JEC-1 I most certainly must disagree that logging is detrimental to wildlife. I have talked to loggers who say the deer show up as soon as they start their chain saws. I know myself when I go hunting, I hunt clearcuts if I want good hunting.

JEC-2 I and my family would like to remain in Alaska and continue our lifestyle, and we can, if we are allowed to harvest a natural renewable resource that our government signed a contract on many years ago.

I would like to see the maximum volume of timber allowable under the current forest plan in the Control Lake area be logged.

Sincerely,

Jerry E. Collins

Jerry E. Collins

Responses to Jerry E. Collins

JEC-1 Clearcuts typically provide high deer forage levels for about 25 years after harvest in Southeast Alaska. After this period the young second-growth canopy usually closes in so tight that deer forage plants are shaded out and forage production drops off markedly. Without intermediate stand treatments, these second-growth stands remain in a relatively non-productive stage for deer until towards the end of the rotation when the canopy begins to open up again. In addition, although clearcuts typically have high forage production, the availability of forage may be low during severe winters when snow buries forage plants or makes deer movements difficult in the open clearcuts. During these critical periods for deer, old-growth or mature forests are usually sought out because they provide some forage and have lower snow depths than open areas due to snow interception by the forest canopy.

One of the reasons that clearcuts often provide good deer hunting is visibility. A hunter can cover more ground from a single vantage point.

JEC-2 Comment noted.

Comments of Lloyd Combs

December 20, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska, 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I am a citizen who lives in Southeast Alaska. I am concerned that the Forest Service may not have my best interest at heart. I want to tell you what I would like to see in the Final Environmental Impact Statement so that you can put it into the plan.

LC-1 I don't think the Forest Service should require timing restrictions on animals that are not threatened or endangered. There should be no goose timing, wolf timing, swan timing, or any other timing restrictions on animals that someone can legally shoot. It does not make sense.

LC-2 I don't think the Forest Service should add a special interest groups proposal to the EIS document. These people don't speak for me. I don't agree with their plan. If I got some people together and we came up with a plan, would you include it in your EIS? I don't think you would, otherwise you would be flooded by everyone's plans and you EIS would become useless. Please think about it and remove the "Citizen's Plan" form the Appendix.

LC-3 I don't agree with the proposed HCA strategy. The scientists do not have anything to back up the plan. Lets wait and do your field work before taking such large actions which effect peoples lives, jobs, and homes.

LC-4 I agree that we can harvest timber in Southeast Alaska. I agree we should log the most volume possible from the Control Lake Planning Area as possible under the current Forest Plan.

Sincerely, Lloyd Combs

Box 5011
KTN, AK
99901

Responses to Lloyd Combs

LC-1 The policy of the Tongass National Forest is to identify and manage sensitive species and their habitats to prevent the species from becoming threatened or endangered because of Forest Service management actions (1997 TLMP Revision). Timing restrictions are designated for species that, during a specific period of time, are very sensitive to a particular type of disturbance. Timing restrictions may be proposed for threatened or endangered species, USFWS species of concern or Forest Service sensitive species. In addition, numerous game species, such as Vancouver Canada Goose, also receive timing restrictions to keep these populations at harvestable levels.

LC-2 This alternative is being considered in detail because it was developed by an assemblage of different groups with wide representation, not just one special interest group. Also, it represents a substantial investment of time by the members of the coalition.

LC-3 The old-growth retention strategy in the SDEIS teirs directly to the strategy developed and incorporated into the new Forest Plan. Rationale for this strategy is provided in the 1997 TLMP Revision.

LC-4 Comment noted.

Comments of Denny Corbin

Starbuck Charters Alaskan Guide Service ☎ 805-963-5037 12/12/95 11:22 PM 1/1

RECEIVED DEC 1 2 1995

To. Bradly Powell
Forest Supervisor, Ketchikan Area

Regarding. Logging of Honker Divide and Eleven mile Areas

Dear Bradly Powell

DC-1

I am writing to inform you of my opposition to logging without considering the public process and the needs of the people that live around and use the Tongass. I live by Pelican and will not be affected by your decision to log the last bit of Prince of Whales Island. But I can see that with this kind of decision making going on it won't be long before the huge Japanese freighters are anchored right in front of my wilderness lodge. Alternative ten may not meet the Alaska Pulp Corporations 50 year contract but it sounds like a good plan for the long range use of the Tongass. You guys have the perfect opportunity to start developing a sustainable timber industry in Southeast you have all the scientific evidence that this logging will hurt the subsistence hunting and fishing, put small timber businesses out of business and ruin the area for tourism. Why not take this advantage and create a new way of dealing with the issues of how to use the forest. Instead of ignoring your biologists findings and giving in to political pressure or whatever reasons you have for allowing this clear cutting to go on.

Why are we letting these trees go to a few fat cats when they belong to everyone? We should at least be getting a dividend from the timber sales just like from the oil. Timber at any cost is a bad idea. We should put the protection of our wildlife on the top of the list. there have been tons of reports through the years proving this the viable wildlife population committee report and its peer review, the andromous fish habitat assessment, to name a few.

I hope you will consider my input unlike the way you considered Alternative 10

Sincerely,

Denny Corbin
box 765
Pelican, AK 99832
e-mail Kuhook@aol.com

c c Phil Janik
Regional Forester

Responses to Denny Corbin

DC-1 Comment noted. Please refer to responses to GRB-1, GRB-2, GRB-3, GRB-4, and EDJ-3.

Comments of Carol Dejka

Carol Dejka
Bx 168
Gustavus, Ak 99826
Dec 26, 1995

Forest Supervisor
KTN Area
Tongass Nat'l Forest
Att: Control Lake EIS
Federal Building
KTN, Ak 99901

Hello,

CD-1 I support Alternative 10, as discribed in the Control Lake Timber Sale Draft EIS, known as the Citizens Alternative and supported by the Communities of Craig, Klawock and Hydaburg. This is the only alternative which offers tax payers a net profit.

What is the increase of that net profit when the timber is milled into lumber on P.O.W.? what is the incremental increase again if a wood manufacturing industry were to utilize the wood? I ask you to consider as the ultimate validity, the voices of residents in S.E. Ak., demanding economic sustainability.

CD-2 Is there a war on living forests going on?

The photo on page 3, Chapt. 2, Vol I detailing the pristine condition of Forest in the Upper and Lower Cutthroat Lakes is a reminder of where the Tongass is coming from. Vol III of the Control Lake EIS is graphic evidence of where it's headed. In my mind I fill a Vol IV with more forest photos of the eco system up for clearcutting.

I wonder how much further this Control Lake Project would go, if Dec 27th, 1995, every person involved or about to be involved thru it's completion, woke up to realize their freedom, to walk out into the world and live according to need need and survival, just as the forest lives.

Other states mismanaged their eco systems. Instead of hiding clearcuts behind visual buffers of forest strips along highways, the clearcuts could line the roadways. Keeping travelers informed of the process of timber harvest. Travelers intent on a visit to the forest could have a short hike across clearcut habitat. Very little of the Tongass is owned by private corporations, as they are in other states.

DEC-26-95 TUE 20:53 BRAILEY/STEVELER 907 697 2287 P.01

Responses to Carol Dejka

CD-1 Comment noted. Refer to response to SEAC-6.

CD-2 Comment noted.

Comments of Carol Dejka

page 2 of 2 — C. Dejka

Forest Supervisor

CD-2 | Any similarity between a clearcut and a war zone would have a clear and simple coherency in the minds of many viewers.

CD-3 | As 2nd growth trees reach height along the highway bounded by the mandated clearcuts, those trees would form an impenetrable barrier, thus keeping the Forest remnants of Habitat Corridors and their inhabitants safe from further interference by the dominant species. Endangered Species status is cold comfort from any place in the food chain. With the Forest and inhabitants safe from visitation, view, or meddling of any sort, tourist attractions could then assume their intended economic importance as artificial habitats for the basics of Food, Warmth and Shelter for the dominant species; once all supplied by the Forest itself. Now memorialized by proximity, headed for myth.

Clearcutting along highways 20 and 30 would minimize the edge percentage of habitat.

CD-4 | Absent from the EIS, is any large scale view of harvest past and future, in Stanley Creek and Shaheen Creek watersheds to the northwest, all of P.O.W. island; and islands to west and east of Project area.

CD-5 | Proposal to clear cut seems to ignore biodiversity impacts pgs 107, 108, 110, 111 chapt 3 Vol I.

CD-6 | From the Juneau Empire, "a forest Service team will discuss the findings of a recent study and explain why more protection is needed to maintain high quality salmon and steelhead habitat in S.E. Alaska."

CD-7 | I assume pg 131, chap 3 vol I is a Freudian slip, printed "S.E. Asia" rather than S.E. Alaska. In 1991 it takes

CD-8 | 1/3 more loggers to provide timber for the same number of mill employees as in 1981. Are mills more efficient, are trees smaller, where are the job losses?

Surviving in fishing and tourism,

Carol Dejka

DEC-26-95 TUE 20:34 BRAVEL/STEEVELER 907 697 2287 P.02

Responses to Carol Dejka

CD-3 Comment noted.

CD-4 The extent of past harvest on Prince of Wales Island is documented in the DEIS in the subsection titled "Cumulative Harvest on Prince of Wales Island" which is found in the Silviculture, Timber, and Vegetation section of Chapter 4 (see Table 4-39). This discussion breaks down the past harvest by geographic area. Staney and Shaheen Creek watersheds (which are in Management Area K07) are included in the North-central Road System geographic area in this description. The islands to the west of the project area (which are mostly in Management Areas K11, K20, and K22) are included in the Isolated Areas geographic area.

CD-5 The effects of future harvest on forest fragmentation and connectivity are fully considered in both the DEIS and the SDEIS. Please note that the Control Lake project proposes a large amount of non-traditional clearcutting (which include green retention trees) and partial cutting.

CD-6 Refer to the response to SEAC-26.

CD-7 This has been corrected in the SDEIS.

CD-8 This table relates to the entire wood products industry of Southeast Alaska, not just to that portion of the industry tied to the pulp mills. The number of logging jobs is not directly tied to the number of pulp mill jobs because logging jobs include workers associated with the long-term contracts, as well as independent operators including the Native Corporation timber industry. The pulp mills are tied primarily to the long-term contracts only.

Comments of Larry Edwards

Larry Edwards Box 6001 Sitka, Alaska 99835 907-747-8996 FAX=747-4801

USDA FOREST SERVICE
KETCHIKAN AREA
RECEIVED
JAN 8'96
FOREST SUPERVISORS OFFICE

	INIT.	ACT.	INFO.	DATE
FS	BJ			
DFS		✓		
PL & EC	✓			
PAO				
AO				
T.M.				
ENG.				
ECO				

December 25, 1995

Bradley Powell, Forest Supervisor
Ketchikan Area, Tongass NF
ATTN: CONTROL LAKE EIS
Federal Building
Ketchikan, Ak 99901

Subj: COMMENTS ON THE CONTROL LAKE DRAFT-EIS.

Dear Mr. Powell;

These comments were prepared before the deadline and are submitted by fax the Forest Service resumed operation after the furlough. Ranger Archie said in the press that comments would be accepted after 12/26 if there was a furlough. Please make these comments part of the planning record.

LE-1

I urge you to adopt Alternative-1, the No-Action Alternative, for the Control Lake Timber Sale Project.

In particular, I ask that there be no logging in the Eleven Mile area or in the watersheds of Honker Divide.

While I would have considered the Citizens' Alternative (Alternative-10) to be marginally acceptable (but only if modified), because this alternative was not studied in detail by the Planning Team, you are not in a position to accept it anyway, unless additional analysis is conducted and a Supplemental-DEIS is issued.

I ask that you issue a determination that the environmental and social impacts of the action alternatives that were studied in detail are sufficiently great that this project should not proceed -- a determination that the No-Action Alternative is adopted.

LE-2

After doing so, I ask that you initiate two additional actions: 1) An investigation to determine whether the KPC contract should be terminated for cause. Two causes should be investigated. First, whether the contact section that allows termination if the contract results in unacceptable environmental damage should be invoked. (in this case based both on the cumulative effects of logging and on KPC's record of willful pollution violations at its pulp mill). The second cause is whether the Forest Service has already supplied sufficient timber for a mill of the size specified in the contract, considering all timber from the Tongass that KPC has obtained. 2) The second action I request is preparation of a mid-level "Area Plan" for the Ketchikan Area, as required by TLMP. This area plan should move the location and sizing of all timber

Responses to Larry Edwards

LE-1 Alternative 10 and the other appendix alternatives were analyzed in detail as can be seen by the evaluation presented in Appendix B of the DEIS. In any case, Alternative 10 is analyzed in detail in the SDEIS. Alternative 1, the No Action alternative, will be considered along with the other alternatives in the decision-making process.

LE-2 The KPC contract has recently been modified and will end in the year 1999. Timber from the Control Lake project will be offered through the independent sale program. See response to CLCC-1.

The Forest Plan has now been revised (TLMP 1997) and provides up-to-date direction for project implementation.

We disagree that the analysis in the DEIS was incomplete. Further, we do not agree that the cumulative impacts associated with the Control Lake project were understated in the DEIS. As can be noted in the SDEIS, cumulative effects are now expected to be less due to the Forest Plan revision. See response to SEAC-7 and SEAC-11.

Comments of Larry Edwards

LE-2 (cont.) projects out of the secrecy of Forest Service closed-door meetings into the spotlight of public involvment through a NEPA process. During this process, any citizen-generated or community-generated alternatives proposed should be "studied in detail."

That project impacts are sufficiently great to justify terminating this project is clear from the discussion at the bottom of page 4-102 and Table 4-47. As you will see later, I am highly critical of that analysis because it is incomplete; however, it gives sufficient information to justify cancellation. Many of the impacts of this project and some of the past logging in the Project Area will not come to fruition until after the year 2004, so they are concealed in the column for the year 2054. The implication of the table is that the direct cumulative impacts from this project are much lower than they actually will be.

THE DECISION ON THIS PROJECT IS NOT CONSTRAINED TO SATISFYING THE STATED PURPOSE AND NEED STATED FOR THE PROJECT.

LE-3 In the DEIS, the USFS relies on three factors to justify its contention that its decision for this project is limited to the action alternatives studied in detail in the DEIS. I contend that, to the contrary, no such constraints exist. The only constraints on this project are those under laws such as the Tongass Timber Reform Act and National Forest Management Act which dictate wise management of natural resources, and the National Environmental Policy Act which dictates that all reasonable alternatives be considered.

One such justification used by the Forest Service is that all lands in the Project Area are LUD-III or -IV. However, the judge in the Tenakee Springs case ordered that the LUDs in TLMP are permissive, not prescriptive. They may be logged up to the intensity permitted by their LUD classification, but need not be.

LE-4 Another agency justification is that the Purpose and Need for the project has primacy over other resource considerations. This has no basis in law or regulation, however. A secret mid-level of planning in fact does exist between TLMP and the project level. Significant federal decisions affecting the environment are made at this mid-level, yet there is absolutely no public involvment and no NEPA review. Reasonable alternatives, for example Alternative-10, have been denied detailed study simply because they would not provide the timber volume targeted for the project by the secret mid-level plan. In fact, even the selection of the Project Area itself was improperly done in this secret plan.

LE-5 The third agency justification for this project is that it is necessary to supply KPC with a three year supply of timber. The supposed need for this three year supply arose from a misinterpretation of the Tongass Timber Reform Act, which instead precludes the pulp mill from building up more than a three year supply of unlogged timber. Even were this not the case, I believe you have ample justification to recommend to the Chief of the Forest Service that the KPC contract be terminated, under its own terms, for

Responses to Larry Edwards

LE-3 Note that the range of alternatives has been greatly expanded in the SDEIS.

LE-4 We disagree that the selection of the Control Lake project was improperly done. Note that Alternative 10 is included in the SDEIS, the purpose and need has been modified in the SDEIS, and two new alternatives that are entirely consistent with the new Forest Plan revision has been incorporated into the SDEIS. See response to SEAC-7.

LE-5 The issue regarding the volume of timber the Forest Service needs to provide KPC is no longer relevant and is beyond the scope of this project.

Comments of Larry Edwards

3

LE-5 (cont.) cause.

ADDITIONAL COMMENTS:

LE-6 P.3-18: The fifth paragraph under "Landslides" provides an incomplete analysis of the effect of logging on landslides. The clear implication of the paragraph is that logging increases the acreage disturbed by landslides only slightly; however, what is sorely lacking in the analysis is consideration of how many acres of MMI-3 and MMI-4 exist in logged and old-growth areas that were studied after the 1993 storm, and the numbers of slides and disturbed acres under each of these classifications. The statistics I need to see here are average number and size of slides "per acre" of MMI-3 logged areas and old-growth areas, and similar figures for MMI-2 (where perhaps 13 percent of the slides apparently occurred). The conclusions reach by this analysis will likely be much different than in the DEIS.

LE-7 P.3.52, "Desired Future Condition": I believe the "future appearance" described in the second paragraph has already been more than sufficiently achieved. No further effort to create a "mosaic" is needed.

LE-8 P.3-63: To comply with TTRA it is necessary to calculate proportionality separately for Volume-Classes 6 and 7.

LE-9 Chapter 3, Vegetation & Timber section: The rotation length was not discussed either here or in Chapter 4, yet is of vital importance for determining sustainability of harvest. The amounts of the various Volume-Classes were not discussed except in terms of proportionality -- analysis must go beyond this though and discuss the existence of each in absolute numbers, and compare those numbers to the original (pre-logging) amounts that existed in the Project Area.

LE-10 P.3-87: Use of the Habitat Capability Model for deep to state an absolute population capability for the Project Area (5,204 in the 4th paragraph) is a misuse of such models, as is the statement that habitat capability has been reduced "9 percent" since KPC began operation. See a more detailed critique on reliance on habitat modelling herein. The reduction is habitat capability could well be significantly greater than the 9 percent stated.

Also, emphasis on the deer analysis on pp.3-86 and 87 is on winter habitat. While winter habitat is important, loss of habitat used at other times of year can have a profound effect on deer survival (and populations and subsistence use of deer) if deer are pressed into good winter habitat prematurely during the year, or if after surviving the winter and depleting the winter habitat, somewhat higher elevation habitat needed during the spring has been lost to logging.

Heavy reliance of the DEIS on habitat capability models for a number of species is a significant weakness of the DEIS, sufficient to invalidate the DEIS as the foundation of decision making.

LE-11 P.3-101: The marbled murrelet surveys that were done do not

Responses to Larry Edwards

LE-6 The referenced report (Forest Service 1994a) was an aerial survey of landslides caused by the October 25 and 26, 1993 storm. Data for each slide was recorded but it did not consider the overall acreages of MMI3 and MMI4; consequently, the average number and size of slides "per acre" is not available. The report did consider the number of slides by mass movement index at the initiation zone. MMI1 and MMI2 had 2.1 and 11.4 percent, respectively, of the landslides evaluated. Since 86.5 percent of the landslides occurred in MMI3, the study concluded that "the Ketchikan Area soil mass movement index is capable of rating the relative susceptibility of soils to landsliding" (Forest Service 1994a, p7). In addition, see response to LE-18.

LE-7 This section has been modified in the SDEIS to reflect the Forest Plan revision.

LE-8 Refer to response to SEACC-15.

LE-9 Refer to response to TCS-11.

Sustainability of harvest is a Forest-wide issue. A complete discussion regarding the sustainability of harvest and rotation lengths is provided in the 1997 Forest Plan Revision.

Table 4-28 (and Table 3.6-9 in Appendix B) in the Draft EIS present both the acres of high volume and the proportion of high volume in each Management Area. The number of acres in low and high volume (prior to the start of commercial logging) is not available and is not the basis for conducting effects analysis for NEPA documents. The current condition of the project area is used as the basis for evaluating the effects of proposed alternatives.

LE-10 As stated in paragraph 3 of the Management Indicator Species section of the Draft EIS, "the models are designed to estimate the

Comments of Larry Edwards

4

LE-11 (cont.) comply with established survey protocol. Given the apparent importance of Prince of Wales island in general (and the Project Area in particular) for nesting by this species, and in view of the substantial loss and fragmentation of old-growth habitat on Prince of Wales (and the Project Area), accurate surveys following established protocol should have been conducted. Lacking such surveys, the DEIS is not an adequate document for the foundation of a decision.

LE-12 PP.3-110, 111: The maps showing forest patches should have been printed color, or at least should have been printed on larger sheets if in black on white. In their present form, they are of negligible use to reviewers, although the information presented is of great importance.

LE-13 Chapter 3, Subsistence section generally: Does not address how deer hunting subsistence use patterns of each community are likely to change over time, as hunters in some community become displaced from their traditional subsistence use areas by time-delayed effects of logging.

LE-14 P.4-1: In defining the term "cumulative impact," the DEIS speaks only of collectively significant actions "taking place over a period of time."

Tiers to TLMP, but does not explain ~~who~~ WHAT TLMP info was considered in the analysis.

LE-15 P.4-3: It is stated that KPC is responsible for ensuring compliance of its pulp mill with air quality standards, the Forest Service has a responsibility to assure that KPC is living up to its responsibility and that the Forest Service is not supporting an environmental irresponsible operation by supplying it with timber.

LE-16 P.4-14,15: The discussion of landslides is highly generalized, non-site-specific to the Project Area and alternatives, and unanalytic even as a qualitative approach.

The cumulative analysis on P.4-15 assumes that "most of these effects will be relatively short-term," and also "consequently, after about 20 years from any individual entry, the effect diminishes significantly." However, these assumptions not true! Slopes that were logged 40 years ago near Hollis slid during the 1993 storm. The 3-5 year rule of thumb mentioned is invalid under conditions which have now been demonstrated to occur on Prince of Wales Island.

The cumulative analysis is limited to consideration to the cumulative total amount of High MMI (MMI-3) soils that would be affected, rather than on a site-specific, unit by unit consideration of what will happen to water quality and aquatic habitat if slides were to occur on the various logging units and roads. Inevitably, many such slides will occur over time if one of the action alternatives for this project are completed.

LE-17 As a result, also missing in the analysis is any comparison whatever of the likely relative impacts of the various alternatives

Responses to Larry Edwards

LE-10 (cont.) capability of habitats in the study area to support MIS populations. Although they do not reflect actual populations, the models provide a method for identifying and quantifying habitat values for MIS and indicate limiting factors on a population. The habitat capability estimates can be used to evaluate, on a comparative basis, the effects of management activities." In order to further clarify the intended use of the model results, the habitat capability tables in the SDEIS have been modified to present only the relative change in habitat capability.

Although the MIS analysis concentrated on winter range habitat as the limiting factor, a premise that is accepted for Southeast Alaska, field reconnaissance also included collection of forage plot data and identification of existing travel corridors. The SDEIS addresses the revised deer habitat capability model used in the 1997 Forest Plan Revision.

We disagree with your assessment that use of the habitat capability models weakens the Draft EIS. As noted above, the habitat capability models were used as a comparative tool, not to identify actual population numbers. The models provide a quantitative method for assessing, in a comparative manner, the effects of timber harvest on a species habitat, particularly when working with a large project area. In addition, this is not the only information used in determining the effects of harvest on wildlife species. Site-specific information gathered during the 1993 field season, previously collected data, and current scientific papers were used when determining the effects of harvest, identifying the areas of highest concern, and determining harvest prescriptions.

LE-11 We disagree with this statement. The marbled murrelet surveys were conducted in accordance with Ralph et al. (1993), the accepted protocol at the time the surveys were conducted. We disagree that further surveys are needed to provide a foundation of a decision. As noted in the DEIS and SDEIS, available information indicates that Prince of Wales Island and the project area in particular are heavily used by nesting marbled murrelets.

Comments of Larry Edwards

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LE-17 (cont.) to water quality and aquatic habitat. How do the alternatives rank in degree of risk to the resources? The DEIS is silent on this. How does the risk from Alternative 10 compare to the risk from the other action alternatives? There is a really valuable analysis that is missing, because of the dramatically lower amount of logging and roading in Alternative-10!

LE-18 Another assumption of the DEIS is that only Very High Hazard soils (MMI-4) need be avoided; however, in the 1993 storm 87 percent of slides were in High Hazard (MMI-3) soils. Significantly, 13 percent of slides were in Medium or Low Hazard (MMI-1 or MMI-2) soils. Such soils have apparently been given no consideration in the DEIS and field work.

LE-19 P.4-59: The set of tables beginning on this page should have been designed to show cumulative acreages (and percentages) as well as the directly affected acreages that are shown.

LE-20 P.4-81: The table should show, in addition, the cumulative number of acres (as an absolute number, not an average) cut or projected to be cut for each time period.

LE-21 P.4-84: Discounting "soft falldown" in the analysis is highly optimistic and should not be done. 1) The practice of deferring logging in areas adjacent to logged units that are not yet adequately restocked has traditionally been done for purely silvicultural reasons; however, cumulatively creating large areas of second growth by, over time, placing smaller units next to one another is a practice which will be viewed with increasing disfavor with each passing year and eventually be prohibited. 2) TTRA proportionality must be considered over the entire rotation, and management areas which have already seen extensive highgrading are unlikely to see significant future logging of falldown that originates out of proportionality concerns. Planning should be conservative, not overly optimistic. Therefore, the Control Lake plan should consider so-called soft falldown to be hard falldown, until and unless demonstrated otherwise on a site-specific basis.

LE-22 PP.4-83 to 85: The discussion of falldown is deficient in not analyzing the effect of falldown on sustainability of the timber supply in the project area, and determining whether the various Control Lake alternatives are in fact sustainable. This is true particularly in light of the last paragraph on P.4-86 (continuing to the next page). Since "the long-term timber supply has a high probability of substantial shrinkage following completion of the future Forest Plan," Alternative-10 should have been included in the alternatives studied in detail, and should have been identified as the Preferred Alternative.

LE-23 Tables 4-40 and 3-23: Terminology used in the former needs to be brought into conformance with that in the former. Instead of "regeneration" say "clearcut" -- please don't use Orwellian double-speak. The same problem exists within the body of the text.

LE-24 P.4-100: Considering snags, the longest time horizon

Responses to Larry Edwards

LE-12 We believe the maps are sufficiently readable in black-and-white for the reader to understand the distribution and size of forest patches in the project area, especially when they are supported by the text and the quantitative information on forest patches provided in the tables.

LE-13 The cumulative effects on subsistence use of deer by the residents of each community are not addressed in the Chapter 3 (which is the Affected Environment chapter), but are specifically addressed in the Subsistence section of Chapter 4 (the Environmental Consequences chapter).

LE-14 The DEIS does not limit "cumulative effects" to "collectively significant actions taking place over a period of time," but says that they can result in these. The DEIS and SDEIS defines cumulative effects as those that result from the incremental effects of actions when added to other past, present, and reasonably forseeable future actions, regardless of what agency or person undertakes such other actions.

The SDEIS now tiers to the current TLMP, the 1997 Forest Plan Revision and related EIS. Specific portions of these documents are generally cited where they apply to the Control Lake SDEIS.

LE-15 Refer to response to LE-5 and SEAC-11.

LE-16 The EIS states that loss of soil cohesion from root decay should decrease after about 20 years because of the regrowth of trees and tree roots. It does not state or imply that landslides will not occur in previously harvested areas after twenty years. Landslides will continue to occur.

LE-17 In Figure 2-4 and the associated text in Chapter 2 of the DEIS, the alternatives were directly compared in terms of risk to water

Comments of Larry Edwards

LE-24 (cont.) considered for snag recruitment is the length of the rotation. However, at least an adequate number snags must be provided perpetually. The analysis has not looked at how to accomplish this, and is therefore deficient.

LE-25 P.4-101, "Wildlife Population Objectives" and "Cumulative Effects": These subsections, and in fact the entire Wildlife section of Chapter 4, place far too much emphasis on Habitat Capability Models and reach unsupportable conclusions about effects as a result.

Additionally, the cumulative effects analysis is faulty because it does not look beyond the project boundaries. The Project Area is not an island, and must be viewed in isolation. Symptomatic of this failure, the separate Control Lake Project Area map shows past logging on the private land near Big Salt Lake, but does not show the character of the land that remains unlogged. More significantly, the map is white for all management areas surrounding the Project Area -- showing neither how much has been logged nor the character of what has not been logged. For this DEIS to be adequate, it needs an "original conditions" map similar to this one but showing substantial area around the Project Area, and a "current conditions" map modifying that one by showing past logging, logging planned by other projects, and additional logging that may be expected to occur on private lands.

LE-26 P.4-102 and Table 4-47: It is stated on P.4-102 that "This (table) ... illustrates the long-term effect on wildlife populations from CONTINUED timber harvest ..." (emphasis added). This is not entirely true. Due to the decades-long delay in appearance of wildlife population declines, much of the ultimate impact (for example a 70% decline in deer by the year 2054) will happen even if there is not any further harvest. As Table 4-47 presently exists, it is a poor analytical tool. It does nothing to show what components of the predicted year-2054 declines will come from past logging, logging in the Control Lake Project, and later logging the TLMP Draft Revision (1991) implies.

Without all of this information, an informed decision cannot be made on this project. The eventual cumulative impacts of logging in the project area shown in this table are the CRUX of the decision to be made on this project. I believe this information will show that the Project Area has already been committed to unacceptable declines in wildlife populations, and that all of the action alternatives studied in detail (Alternatives 2, 7, 8 and 9) are absolutely unacceptable.

In question here is continuing to provide the sustainable yield of all renewable resources (i.e. compliance with TTRA Section 101) and assuring viable, well-distributed populations of all species (compliance with NFMA).

LE-27 GENERAL COMMENTS ON HABITAT CAPABILITY MODELS:

I have criticized the heavy reliance of the DEIS on habitat

Responses to Larry Edwards

LE-17 (cont.) quality and fish habitat. This same information, including five quantitative measures of risk, was also provided for Alternative 10 and the other appendix alternatives in Section 2 of Appendix B. Alternative 10 and the other alternatives in the SDEIS are now quantitatively compared in Chapter 2 of the SDEIS.

LE-18 The MMI mapping in the GIS database is a broad mapping and it is recognized that there are inclusions of very high MMI in the other categories. These inclusions are one reason that field reconnaissance is performed at this planning level. In addition, further field work is performed during implementation. Final unit and road layout will look at these areas in even further detail than the reconnaissance level used in this planning phase.

LE-19 Table 4-22 of the Draft EIS shows both the absolute number of acres proposed for harvest by volume class and the percentage of the existing volume class acreage. Past harvest within the project area is shown in Table 4-35 of the Draft EIS.

LE-20 Past harvest within the project area is shown for each 5-year period between 1940 and 1994 in Table 4-35 of the Draft EIS. Proposed harvest beyond 2005 is addressed through the Forest planning process and is documented in the 1997 TMLP Revision.

LE-21 Note that "soft falldown" refers to areas not available at this time, but still considered suitable. This is a way to separate these acres from acres found to be unsuitable for harvest that needs to be taken from the Forest Plan base (hard falldown). Note that all project volume is now planned for the independent sale program; therefore, proportionality is no longer an issue.

LE-22 Refer to response TCS-4.

Comments of Larry Edwards

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LE-27 capability models several times in these comments. A more detailed critique of this reliance in included here.

The DEIS relies heavily on Habitat Capability Modelling to analyze impacts. This is the primary foundation for wildlife and subsistence analysis in the DEIS, and it is a completely inappropriate use of HCMs.

In the Wildlife Society lawsuit over the Kelp Bay Project, the use of timber type maps for determining "proportionality" was determined by the court to be arbitrary and capricious. This is because the timber type maps (or databases) are remarkable in their high level of inaccuracy as to where habitats of various qualities are located. The habitat capability models are based on these same maps, and basing impact analysis on these models is therefore arbitrary and capricious as well. This is a major point, considering the tremendous social and economic value of wildlife resources in the project area to the people who rely on them for subsistence or (in the case of a large number of hunters from Ketchikan) to fill their larders by sport hunting.

In addition, the habitat capability models are very crude. They do not take into account what is sometimes referred to as the juxtaposition of habitats. All acres of a given volume class are considered to have the same value to wildlife, while in fact those isolated or fragmented by logging or muskeg have may have little or no wildlife value in comparison to stands with a more favorable juxtaposition to other habitat types. Fish and Game has found in Peril Strait (near Sitka), for example, that deer winter mortality is two times higher in fragmented than unfragmented habitat.

The "peer review" to the Viable Populations Committee Report, and the committee's response to the peer review are revealing of the problems with the degree of reliance the DEIS places on habitat capability models.

Citations from the "peer review" of March 1994:

(p.5): "... none (of the Habitat Capability Models) has any calculation of the probable error associated with them. The modeling approach needs to be rethought and a program of work to develop them into models that have Tongass-specific data and confidence limits needs to be developed."

(p.14) Habitat Capability Models in General. "We have a good deal of reservation about the HCMs. The greatest concern is about the false precision that the models imply. They may be precise, but the accuracy is unknown and we assume it to be very low. The models are deterministic and do not take into account any stochastic features of the relationship between habitat and population and they are parameterized with data whose error limits are unknown and very likely high. Thus the confidence limits for the models, were they to be calculated in some way, would surely be so large as to render the models close to useless. Also, as the authors of 'Models' point out, the models may be quite sensitive to small changes in parameter

Responses to Larry Edwards

LE-23 Terminology in the tables has been made consistent and more descriptive.

LE-24 The scope of the cumulative effects analysis for this EIS is through the end of the current rotation (approximately 2054). The current harvest plan (see Unit Design Cards and Prescriptions) specifies the retention of green trees which will, in time, become snags. It is anticipated that these green trees and snags would be retained in the next rotation, along with additional green trees, thereby continuing the cycle of providing sufficient snag densities across the landscape. The clearcuts with various levels of structure reserved and the harvest methods other than clearcutting were prescribed partly to address short-term and long-term snag-related habitat.

LE-25 We disagree that the cumulative effects analysis is faulty.

As stated in paragraph 3 of the Management Indicator Species section of the DEIS, "the models are designed to estimate the capability of habitats in the study area to support MIS populations. Although they do not reflect actual populations, the models provide a method for identifying and quantifying habitat values for MIS and indicate limiting factors on a population. The habitat capability estimates can be used to evaluate, on a comparative basis, the effects of management activities". In order to further clarify the intended use of the model results, the habitat capability tables in the SDEIS have been modified to present only the relative change in habitat capability.

Chapter 3, Biodiversity section, of the EIS addresses how the Control Lake project area will contribute to the maintenance of well-distributed, viable populations of wildlife on Prince of Wales Island. The Forest Plan, and its revisions, address viability of wildlife populations on a Forest-wide level, including consideration of cumulative effects, and in consideration of adjacent private lands. The 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining well-distributed, viable populations of wildlife species on the Tongass.

Comments of Larry Edwards

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LE-27 (cont.)

values in ways that are not understood."

"These models have played a useful role in organizing current knowledge and emphasizing knowledge gaps, but it is now time to build on this beginning and move to more realistic approaches whose confidence limits can be calculated.

(p.22): specific to the Sitka Black-tailed deer model. ... "The sampling and analysis techniques used to verify the model are problematic in that there is not enough methodological information available on which to evaluate the analyses. ... An additional concern addresses the issue of using a mean value for snowfall throughout the (Tongass) when there is considerable variation from northern to southern regions of the forest. The model needs to incorporate these issues in order to provide a realistic assessment of the habitat. The HCA model for maintaining viable populations of Sitka black-tailed deer on the Tongass National Forest is probably not suited for the long term. McCullough expresses concerns that problems of oscillating factors may create extremes in population that would make the deer especially vulnerable to the pressures of hunting and wolf predation. THIS COMBINATION OF FACTORS COULD PLACE THE VIABILITY OF THE SPECIES IN QUESTION." (emphasis added.)

Response of the Interagency Viable Wildlife Populations Committee (May 1994):

"The habitat capability models have a role to play in making relative comparisons of the likely effects of different management alternatives on wildlife. They are relatively simple, deterministic models. We do not support using them for analysis of viability. We fully concur with the recommendation that spatially explicit (Population Viability Assessments) are superior for evaluating viability concerns." (p.8)

I will conclude this critique of reliance on habitat capability models by observing that the DEIS has seriously raised the question of viability for a number of species (bottom of page 4-102). Given the highly uncertain accuracy of the habitat capability models, the situation can easily be much worse than indicated by Table 4-47. A conservative, precautionary approach is therefore dictated under principles of resource stewardship and by several laws, including the NFMA. Unfortunately, all of the action alternatives studied in detail throw caution to the wind.

LE-28

P.4-104 to 106: The mitigation measures discussed are minor in view of the expected cumulative impacts of this project.

LE-29

P.4-111, Marbled murrelet: The analysis of impact on marbled murrelets is excessively simplistic. Without a survey that follows established protocol for this species (including the checking of all units in the alternatives) no determination of impact can be made. Logging the wrong areas could have a far greater impact on murrelets than predicted, and lacking the pre-project by-protocol surveys, the

Responses to Larry Edwards

LE-26

The habitat capability model results do not predict actual population numbers. Rather, they reflect the capability of the habitat, at a given point in time, to support animals. The capability estimates reflect the conditions at the given point in time; there is no delay factor. In the DEIS, the 2054 estimates reflect the hypothetical situation that all suitable old-growth under Alternative P of the 1991 TLMP Draft Revision is harvested. In addition, it reflects the fact that many unsuitable acres have also been harvested. This represents a worst-case condition, particularly now that the number of suitable acres in the project area have been substantially reduced by the 1997 TLMP Revision. It is not true that a 70 percent decline in deer habitat capability, or anything close to this large, would occur even if there is no further harvest.

Current and future timber sale planning on Prince of Wales Island is performed in compliance with state and federal law, tiers to the direction provided in the Forest Plan Revision (1997). The 1997 TLMP Revision incorporates a wildlife habitat conservation area strategy for maintaining viable, well-distributed populations of wildlife species on the Tongass. Implementation of this strategy addresses cumulative effects to wildlife species on the landscape level.

Also refer to responses to LE-25 and SEAC-11.

LE-27

The Control LakeDEIS presented habitat capability data from models contained in the 1991 TLMP Draft Revision. These models are not intended to predict population levels or set bag limits. Their use is intended to give a relative comparison between alternatives of the effects to habitat, not to make projections of actual animal numbers. In keeping with the intended use of the model data, SDEIS tables and figures displaying the habitat capability model results have been modified to show only the relative habitat capability, expressed as a percentage of the 1954 (prior to commercial harvest) capability.

Comments of Larry Edwards

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LE-29 (cont.) impact would go undetected. In addition, the murrelet mitigation measure proposed on P.4-106 is absolutely ridiculous. Please contact Kim Nelson at Oregon State University concerning this -- she is a noted expert on murrelets, and in particular the protocol.

LE-30 P.4-118, Forest Fragmentation: The text of this section reveals significant cumulative changes in patch size availability and distribution, as well as significant effects of this project on these factors. The habitat capability model for deer (and probably those for other species as well) do not, however, account for patch size. This revealation and the state of the capability models negates entirely any value of the DEIS as an analytical tool for informing the decisionmaker or the public of potential project impacts on deer (among other species), subsistence, and the subsistence segment of the local and regional economies.

LE-31 Figures 4-2 through 4-6: These maps would be of great interest if they were printed in color, or even they were black and white but larger. In their present form they have no value to the reviewer. Also, a similar map should have been included to show original conditions.

LE-32 P.4-125, Population Viability: The discussion is too abreviated and generic to be of any value in assessing project impacts on the viability of wildlife populations either within or adjacent to the Project Area or on the wide distribution of all species.

LE-33 P.4-126, The project-specific old-growth strategy should not be adopted until it has been peer-reviewed, and the peer review should be included in a supplemental DEIS. Effectiveness of the strategy is not analyzed in the DEIS -- all the DEIS does is present numbers out of context, whereas crucial site-specific factors that are not revealed in the DEIS will be the ultimate determinators of degree of effectiveness.

LE-34 Figure 4-7: This figure portrays a ludicrous amount of logging. The DEIS does not demonstrate that the strategy developed can maintain viable well distributed wildlife populations, or more importantly ~~populations of~~ healthy populations (and ones that for game animals are huntable at traditional per capita hunting levels.

LE-35 ALTERNATIVE-10:

While I agree with the spirit of cooperativeness and the basic strategy that went into devising this alternative, I am deeply troubled by the logging that would be done in the Rio Roberts drainage. Also, I have a long-standing opposition that I feel is well justified to adding on to previously cut areas to create larger and larger areas. This occurs in Alternative-10, and I call special attention to Unit 414. Certainly Alternative-10 would be orders of magnitude more preferrable than any of the action alternatives studied in detail. Still, I must ask for the No-Action Alternative.

Responses to Larry Edwards

LE-27 (cont.) There is a very high risk of error associated with using habitat capability models to predict population availability for subsistence users, rather than as a relative indicator. The recently published 1997 TLMP Revision has discontinued use of habitat capability models, with the exception of a modified deer model. The modified deer model has been analyzed for the Control Lake Project, and the results are presented in the SDEIS. For other species, the TLMP planning team prepared species assessments documenting expected effects of implementation of the proposed revised Forest Plan. Although the assessments were prepared on a Forest-wide, rather than Project-specific basis, they predict effects that are consistent with those described in this EIS for the Control Lake Project.

We agree with your statement that the models should not be used to determine viability of species. The models were not used to determine viability; they were used only as a tool to compare the effects of alternatives on a relative basis.

LE-28 We disagree with your statement. Implementation of the proposed mitigation is expected to substantially lessen the effects of the proposed harvest. Both short-term and long-term mitigation has been prescribed. Forest planning needs to address the projected cumulative effects. The 1997 TLMP Revision is a good example of this with new standards and guidelines as well as LUD changes. Note the differences in cumulative effects between DEIS and SDEIS with the revised plan.

LE-29 Refer to the response to LE-11. We believe the DEIS and SDEIS adequately describe the potential effects on the marbled murrelet in the project area. The new standards and guidelines of the 1997 Forest Plan Revision will also be followed.

LE-30 You are incorrect that the habitat capability model for deer and most other species do not account for patch size effectiveness. Patch size effectiveness was incorporated into the habitat

Comments of Larry Edwards

10.

LE-36 CONCLUSION:

I believe you have two options: 1) either adopt the No-Action alternative and if appropriate design a new, more sensitive project for this area, or 2) study the Citizens' Alternative (Alt-10) and other alternatives of similar strategy in detail, and issue a Supplemental DEIS that analyzes them. I urge the first option.

Sincerely,

Larry Edwards

Responses to Larry Edwards

LE-30 (cont.) capability models for black-tailed deer, wolf (in association with the effects on deer), marten, red-breasted sapsucker, hairy woodpecker, and brown creeper (see footnotes on Tables 4-43 and 4-47 and also discussion on patch size analysis in Biodiversity section of the DEIS).

LE-31 Refer to response to LE-12. A map showing original (1954) conditions is presented in the Biodiversity section of Chapter 3.

LE-32 This discussion has been revised in the SDEIS and now tiers to the viability analysis of the 1997 TLMP Revision.

LE-33 This discussion has also been revised in the SDEIS and now tiers to the wildlife habitat conservation area strategy incorporated by the 1997 Forest Plan Revision for maintaining viable, well-distributed populations of wildlife species on the Tongass.

LE-34 Refer to responses to LE-33 and SEAC-11.

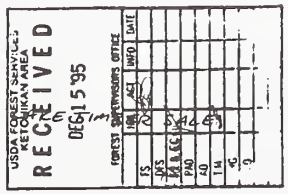
LE-35 Comment noted. However, please note that all aternatives now incorporate little or no logging in the Rio Roberts drainage.

LE-36 Comment noted. An SDEIS has been prepared that includes Alternative 10 and a new Alternative 11.

Comments of Arthur Fossler

Bradley Powell
Forest Supervisor, Ketchikan
Federal Bldg
Ketchikan, AK 99801

DEC 10, 1995



RE: DEIS CONTROL LAKE TIMBER SALE

Dear Mr. Powell:

AF-1 I READ A LETTER FROM YOUR OFFICE TO THE JUNEAU EMPIRE LAST MONTH. IN IT YOU STATED THE LONG-TERM CONTRACT ONLY REQUIRED THE USFS SUPPLY A RANGE OF TIMBER PER DECADE AND THAT THE USFS HAS SUPPLIED NEAR THE MAXIMUM ALLOWED — AND THAT THE ARGUMENT IN TONGASS MANAGEMENT IS BETWEEN WHAT THE USFS SUPPLIES AND THE MAXIMUM AMOUNT REQUIRED.

IN THE CONTROL LAKE DEIS YOU (FALSELY) STATE THE PURPOSE OF THE SALE IS TO MEET THE "NEED" OF PROVIDING 187 MMBF TO KETCHIKAN PULP'S CONTRACT. THE "NEED" YOU SPEAK OF APPARENTLY IS TO MEET THE MAXIMUM ALLOWABLE UNDER THE CONTRACT.

THE USFS HAS NO MANDATE TO HARVEST THIS UNSUSTAINABLE VOLUME. THE PURPOSE HAS NO BASIS IN LAW NOR IN COMMON SENSE FOREST MANAGEMENT.

THEREFORE, THE USFS IS WRONG AND OUT OF COMPLIANCE WITH NEPA REQUIREMENTS TO CONSIDER A FULL RANGE OF ALTERNATIVES. BY SETTING SUCH AN UNREALISTIC and UNSUSTAINABLE PURPOSE OF PROVIDING 187 MMBF, THE USFS HAS EXCLUDED ~~GOAL~~ FROM CONSIDERATION ANY ALTERNATIVE THAT PROVIDES SUSTAINABLE EMPLOYMENT AND SUSTAINABLE PROTECTION OF FISH and WILDLIFE, SUBSISTENCE, RECREATION, TOURISM, SPORT FISHING, and OTHER MULTIPLE USE RESOURCES.

I URGE YOU TO RECONSIDER THE PURPOSE OF THIS TIMBER SALE, TO PROTECT SUSTAINABLE FISH AND WILDLIFE RESOURCES USING THE BEST AVAILABLE SCIENTIFIC RESOURCES (INCLUDING USFS ASSESSMENTS AND REPORTS), AND TO STOP THIS TIMBER-AT-ANY COST MANAGEMENT.

AF-2 ALSO, PLEASE PROTECT THE HONKER DIVIDE FROM YOUR CLEAR CUT "TIMBER TREATMENTS". I SUPPORT THE "CITIZENS ALTERNATIVE" CONCEPT.

Thank you, Arthur Fossler
ARTHUR FOSSLER
427 West 11th
Juneau, AK 99801

CC: PAUL JANIK

Responses to Arthur Fossler

AF-1 Because of the shutdown of the Ketchikan pulp mill by KPC, this point is no longer relevant. The purpose and need in the SDEIS has been substantially modified. Also, please note that both the DEIS and the SDEIS include a variety of "timber treatments" other than clearcutting.

AF-2 Comment noted.

Comments of Joe Geldhof

Joe Geldhof
2579-4 Douglas Hwy
Juneau, AK 99801

December 20, 1995

Bradley Powell
Forest Supervisor,
Ketchikan Area
Federal Building
Ketchikan, Alaska 99901

Re: Control Lake Timber Sale

Dear Mr. Powell:

JG-1 | I'm writing in support of the Citizens' Alternative for the Control Lake Timber Sale. Alternative #10 should be selected for a number of reasons, the most important being the positive financial return to American taxpayers. As near as I can tell from the information generated by your agency, all the other alternatives (except for the "do nothing" alternative), are net money losers. Look, most of us realize you and your staff are decent folks and you've got a tough job what with the long-term contract and politicians crawling on your case everyday, but, don't you get weary of tossing good money after bad all the time?

You can imagine how hopeful and pleased some if were when the residents of Prince of Wales Island developed the Citizens Alternative for the Control Lake

Responses to Joe Geldhof

JG-1 Comment noted. Alternative 10 and another new alternative are included in the SDEIS as alternatives being analyzed in detail. No timber from the Control Lake project will be provided to KPC under the long-term contract. Also see response to SEAC-6.

Comments of Joe Geldhof

JG-1 (cont.)

Timber Sale. In addition to preserving extremally valuable recreation and environmentally sensitive areas, the Citizens Alternative provided for access and logging of decent timber. Isn't this what natural resource management is all about? I especially applaud the efforts of the Prince of Wales residents to provide for sales to smaller loggers. Those of us who have watched the demise of genuine small (smaller?), scale logging after the anti-competitive practices so obviously illustrated in the Reed Brothers lawsuit are still waiting for your agency to take your commitment to small loggers as serious as to the big fellas. ~~But as serious~~ Notice I send as serious, not more seriously. I can well appreciate the problems you and your agency labors under given the long term contract obligation to LP, but let's not continue the time worn path of doing everything for the 50 yr. operators. It's obvious that someone is going to hacked off at you whichever you go. Do what's right for the citizens that live out on POW. Do what's right for the trees. Do what's right for the forest. Pick Alternative #10. Remember you're work for Jack Ward Thomas, not Frank Murkowski. Besides, if someone sachs you up, you'll sleep better knowing you did the right thing. Thanks Joe Geldhof

Responses to Joe Geldhof

Comments of L. Stephanie Harold

P.O. Box 475
Hoonah, AK 99829
December 10, 1995

Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan, AK 99901

Dear Mr. Powell:

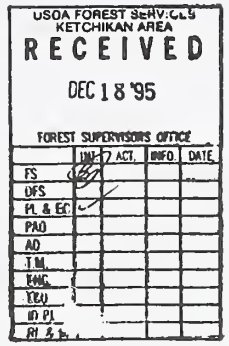
LSH-1 I am writing to express my support for the Citizen's Alternative (Alternative 10) for the Control Lake timber sale EIS. I oppose logging Honker Divide and Elevenmile Peninsula because of the area's recreation and subsistence potential. Moreover, the current DEIS ignores the heavy fish runs in the Thorne River and the impacts on fish habitat by logging discussed in the *Anadromous Fish Habitat Assessment*.

I urge the Forest Service to balance management of the Tongass between the needs of all users and to use your own science to ensure wildlife protection. The Citizen's Alternative does just that.

Thank you for your concern.

Sincerely,

L. Stephanie Harold



Responses to L. Stephanie Harold

LSH-1 Comment noted. Alternative 10 has been moved into the main text in the SDEIS. All of the action alternaties included for detailed analysis in the SDEIS avoid the Honker Divide and Elevenmile areas to varying degrees. Also, refer to response to GRB-4.

Comments of Gene Harrison

DEC 18, 1995

DEAR MR JANIK,

GH-1 I AM WRITING YOU TO VOICE MY OPPOSITION TO THE RECENT PLAN TO LOG IN THE HONKER DIVIDE & ELEVENMILE AREAS.

I SUPPORT ALTERNATIVE 10 (THE CITIZENS' ALTERNATIVE) AND WOULD LIKE TO SEE IT ADOPTED AS THE SELECTED ALTERNATIVE IN THE FINAL DECISION.

I'M DISTURBED WITH THE CONTINUAL TINKERING AT ANY COST MANAGEMENT AND I WILL PERSONALLY CONTINUE TO WORK TOWARDS A MORE BALANCED USE OF THE TONGASS THAT WE ALL CAN SHARE IN AND NOT JUST THE FEW.

USDA FOREST SERVICES
KETCHIKAN AREA
RECEIVED
JAN 16 '96
FOREST SUPERVISORS OFFICE

	INFO	ACT.	INFO	DATE
FS	✓			
DFS				
PL & EC	✓			
PAO				
AQ				
T.M.				
ENG.				
ECO				
W PL				
PL & M				

RESPECTFULLY,

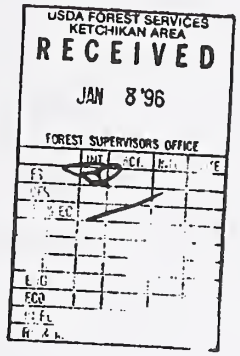
ATTN: CONTROL LAKE

95 DEC 20 AM 9:52
MAILROOM

Responses to Gene Harrison

GH-1 Comment noted. Alternative 10 has been included in the SDEIS. Note that each of the action alternatives avoids the Honker Divide and the Elevenmile areas to varying degrees.

Comments of Russell Heath



December 30, 1995

Bradley Powell
Forest Supervisor
Federal Building
Ketchikan, AK 99901

RE: Control Lake Environmental Impact Statement

Dear Mr. Powell,

RH-1 I am writing in support of Alternative 10 as the preferred alternative in the final decision.

If the Forest Service continues to pursue massive timber sales such as the 187 million board feet sale proposed in Honker Divide and Elevenmile, in the face of broad public opposition, it will only further erode support for the timber industry in southeast Alaska. Each succeeding sale will become more difficult to execute as local anger increases.

You are harming the timber industry in the long run by not being attentive to the concerns of the people and communities of the Tongass.

Sincerely,

Russell Heath
P. O. Box 20205
Juneau, AK 99802

Responses to Russell Heath

RH-1 Comment noted. Note that each of the action alternatives avoids the Honker Divide and the Elevenmile areas to varying degrees.

Comments of Tom Heggestad

Dec. 7, '95

BRAD Powell, Forest Supervisor
Tongass National Forest
Attn: Control Lake EIS
Federal Building
Ketchikan, Ak 99901

Dear Sir,

I've read of the proposal to log the Control Lake area and also of the 'Elevenmile and Honker Divide Citizen's Alternative'. It's been difficult to write to you since one voice hardly seems to matter when powerful corporate interests are pushing a certain direction. Also I realize that the issues are immensely complex and my understanding has barely scratched the surface of grasping it all.

TH-1 Yet if I didn't write and felt something strongly, I'd be unhappy and not truly responsible. Please give more serious weight to the Citizen's Alternative.

Responses to Tom Heggestad

TH-1 Comment noted. Note that Alternative 10 is analyzed in detail in the SDEIS, that each of the action alternatives avoids the Honker Divide and Elevenmile areas to varying degrees, and that the Control Lake project will no longer provide timber under the long-term contract.

Comments of Tom Heggestad

TH-1 (cont.)

As a recent resident of Craig – which I love very much – it makes sense to me to preserve certain areas for old growth forest, for its own sake much less for recreation; also it makes sense that people have the chance to practice subsistance hunting in these areas – too much logging will prevent this; lastly if cutting is to be done, it makes a lot of sense to do it in a way that minimizes damage to the area and maximizes the return to the communities and workers who do the logging. The independent loggers option using many existing roads makes more sense than an outside corporation which cuts many new roads. I believe you may be bound by a long term contract to supply KPC, but isn't there a better way than giving all of Control lake in what appears to be a wasteful manner?

Responses to Tom Heggestad

Comments of Tom Heggestad

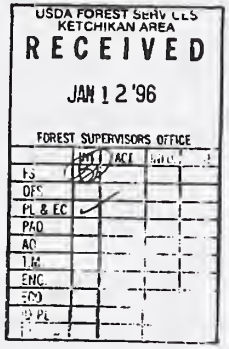
Thank you for your consideration.

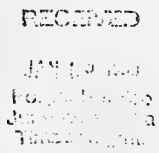
Tom Heggestad

Tom Heggestad
P.O. Box 538
Craig, AK 99921-0538
(907) 826-2776

Responses to Tom Heggestad

Comments of Marge Hermans





December 26, 1995

Mr. Phil Janik
Regional Forester
P.O. Box 21628
Juneau, AK 99801
Fax: (907) 586-7840

Dear Mr. Janik:

MH-1 I thought the Forest Service was supposed to be responsive to public concerns about the use of our national forests.

I thought our national forests were supposed to be for multiple use, not just for large-scale timber extraction.

I thought the Forest Service had established national goals of making logging sustainable over the long term and supportive of the development of value-added industry so that Alaskans and other Americans receive the true economic value of their forest products.

I still think all these things should be so. That is why I feel strongly that the Control Lake Citizens' Alternative--supported by two of the communities who would be most affected by logging in Honker Divide and Elemenmile Peninsula--deserves extremely serious consideration in plans for the use of this area. In fact, I do not see why it should not be adopted.

MH-2 Most of Prince of Wales Island has already been roaded and logged. If interagency cooperation is more than empty words, why are you not recognizing the Dept. of Fish and Game's designation

Responses to Marge Hermans

MH-1 Comment noted. Alternative 10 is included for detailed analysis in the SDEIS. Also, all action alternatives avoid the Honker Divide and Elevenmile areas from partly to completely.

MH-2 The Honker Divide and Thorne River values are being recognized in this analysis as evidenced by the degree of avoidance of these areas by the action alternatives, as well as other mitigation measures. Also, an increased level of stream protection was applied to Control Lake harvest units. Refer to response to SEAC-26.

Comments of Marge Hermans

MH-2 (cont.) of Honker Divide and Thorne River as one of the highest quality watersheds in all of Southeast Alaska? And why are you failing to take into account the Forest Service's own Anadramous Fish Habitat Assessment, which calls for more protection of such critical habitat, not less?

MH-3 Ten years from now it will be common knowledge that large-scale clear-cutting is wasteful and that there are better ways to provide jobs and economic stability from Alaska's forests. As the custodians of our national heritage, I expect the Forest Service to lead the way in managing our forests from a scientifically enlightened perspective that seeks creative solutions for the benefit of all users, not to drag its feet to meet targets set many years ago when catering to pulp mills was the only way we could come up with to make Alaska's forests economically viable.

Roads and large-scale clearcutting in Honker Divide and Elevenmile Peninsula would serve only an antiquated portion of the timber industry and would negate fish and wildlife habitat, recreation, and the inestimable value of scarce remaining old growth forest. I believe the Citizens' Alternative, or some such approach that considers all users and focuses on long-range rather than short-term benefits, should be adopted instead. Please give it your most serious and honest consideration.

Sincerely,

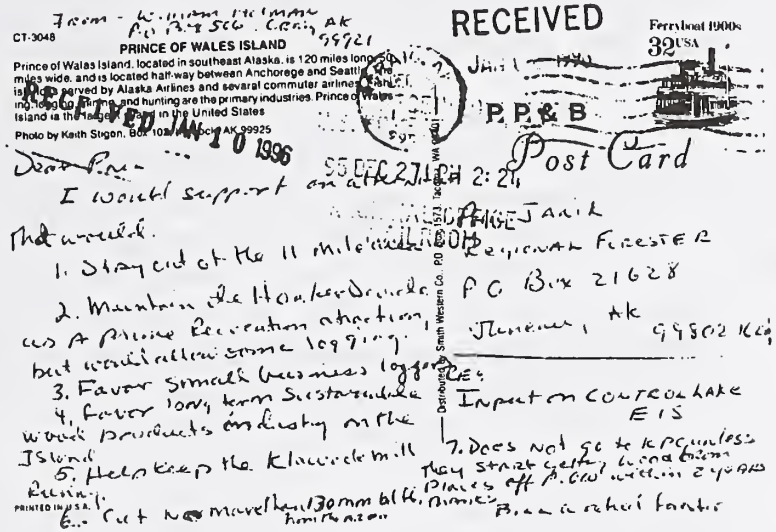
Marge Hermans

Marge Hermans . 9630 Moraine Way . Juneau, AK 99801
Fax: (907) 789-0044

Responses to Marge Hermans

MH-3 Comment noted. Please note that none of the Control Lake project timber will be used to supply the long-term contract. Also, please note that the extensive roads and large-scale clearcutting are not being proposed for the Honker Divide nor the Elevenmile areas by any of the SDEIS action alternatives. Each alternative avoids these areas from partly to completely. Also, please recognize that the Control Lake project incorporates non-traditional clearcutting (which include a greater amount of green tree and snag retention) and partial cutting to a greater extent than previous timber sale projects.

Comments of William Holman


RECEIVED
PRINCE OF WALES ISLAND
Prince of Wales Island, located in southeast Alaska, is 120 miles long, 50 miles wide, and is located half-way between Anchorage and Seattle. The island is served by Alaska Airlines and several commuter airlines daily. Fishing, logging, mining, and hunting are the primary industries. Prince of Wales Island is the largest island in the United States
Photo by Keith Stigen, Box 1028, Ketchikan, AK 99925
P.P.&B
Post Card
Dear Sir -
I would support an alternative
that would:
1. Stay out of the 11 mile area
2. Maintain the Honker Divide
as A Primo Recreation attraction,
but would allow some logging
3. Favor small business loggers
4. Favor long term sustainable
wood products industry on the
Island
5. Help keep the Klawock mill
Regional
6. Cut No
PRINTED IN U.S.A.
From - William Holman
P.O. Box 3456 Craig, AK 99921
Ketchikan, AK 99901
Regional Forester
P O Box 21628
Juneau, Ak 99802
RE: Input on Control Lake EIS
7. Does not go to KPC unless they start getting logs from Pinto Bay area within 2 years

WH-1

Responses to William Holman

WH-1 Comment noted. Please note that Alternative 10 is analyzed in detail in the SDEIS, that each of the action alternatives avoids the Honker Divide and Elevenmile areas to varying degrees, and that the Control Lake project will no longer provide timber to KPC under the long-term contract (all timber will go to the independent sale program).

Comments of Dorothy Hoppe

Brad Powell
Supervisor
USDA - FTN
Ketch. AK. 99901

Dec 22, 1995

Mr. Powell;

I have lived in Ketchikan full time since 1957. We are a family of 3 generations living & working here, most of us in the forest industry. I definitely support the timber industry in Southeast Alaska. We hunt, fish, and use the forest for recreation here and on Prince of Wales. The logging industry does NOT hinder us in our enjoyment in any way!!!

DH-1

DH-2

Too many out of state special interest groups are dictating to me and my family how we are to live in our own state. I think almost all of your special interest restrictions are needless silliness, backed not by clear thinking and good forest biology, but instead, by currently popular ecology thinking.

DH-3

Please open Control Lake to maximum logging. Stop delaying timber sales in order to invent more goofy, inane, regulations

Dorothy Hoppe
PO Box 835
Ward Cove, AK. 99928

Responses to Dorothy Hoppe

DH-1 Comment noted.

DH-2 Comment noted. The Control Lake project will follow the standards and guidelines established in the new Forest Plan (1997).

DH-3 Comment noted. Timber sales have not been delayed for the reason you suggest.

Comments of Blandine T. Jirschele

Blandine T. Jirschele
294 Knudson Cove Road, N
Ketchikan, AK 99901
December 21, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - KTN District
Federal Building
Ketchikan, Ak 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I am originally from Oregon, which also has a long history as a Forest Supported state. For the past 16 years I have chosen to reside in Southeast Alaska. I have enjoyed living, working, and recreating near the forest my entire life. I consider myself fortunate to live in this beautiful state and intend to retire here as well. I therefore consider it an obligation to express my feelings in regard to the timber industry.

BTJ-1 I am in favor of a maximum sustainable harvest of timber in the Control Lake Planning Area. I do not believe that harvesting timber is harmful to deer, or the many other species of wildlife which live in and are sustained by the forest, when that harvest is carried out in a responsible manner. I also believe that the one mile buffer zones around creeks and streams are adequate.

I think it is safe to say that Alaska needs all of her industries if she is to continue to prosper. I for one truly believe that timber, fishing, and tourism can co-exist in Alaska. Everyone concerned must balance their needs along with everyone elses needs; being taken from the same environment. All of the Industries must work together, to find a middle ground, and share in the vast resources of this bountiful state. Then no industry will be lost from Alaska's economy. The economy of the here and now is not our only concern. We need to do what is necessary now, that we may pass onto our children a strong, diversified, multiple industry economy that will support the needs of an Alaska of the future.

Thank you for giving me the opportunity to express my beliefs and to be a part of this planning process.

Sincerely,

Blandine T. Jirschele

Responses to Blandine T. Jirschele

BTJ-1 Comment noted. Please note that one-mile buffer zones around creeks and streams are not used. Forest Plan standards and guidelines require much smaller buffer zones tied to the stream class and channel type.

Comments of Eric David Johnson

Eric David Johnson
2618 Glenwood
Anchorage, AK 99508-4066

Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan, AK 99901

Dear Mr. Powell,

EDJ-1 I am writing to voice my support for the Citizens' Alternative (Alternative 10), and I would like to see it adopted by the Service as its selected alternative. I believe this is the best alternative for true multiple use management of the forest on northern Prince of Wales.

EDJ-2 The importance of preserving Honker Divide and the Elevenmile Peninsula becomes even more apparent when you look at topographical maps of the area. Almost all of northern Prince of Wales has become a maze of logging roads. Honker Divide is but an island of intact old growth forest, surrounded on all sides by a logged landscape. Elevenmile stands out alone, jutting out from the same used up landscape.

EDJ-3 How can we truly have a multiple use forest on northern Pricne of Wales when the last islands of old growth there are being slated for the same use that has already consumed all that surrounds them?

EDJ-4 Protect the salmon of the Thorne River; don't log Honker Divide. Protect the communities of Craig and Klawock by not destroying the Elevenmile Peninsula the people of those communities use. Implement the best scientific information available: the Viable Wildlife Population Committee Report, its peer review, and the Anadromous Fish Habitat Assessment. Listen to this scientific consensus about the need to do more to protect habitat and salmon runs.

EDJ-4 Above all else, don't manage the Tongass for logging alone. Northern Prince of Wales makes a mockery of the whole idea of multiple use management. If you clearcut its last great islands of old growth wilderness, you will undermine and defeat the very mandate that the Forest Service operates under.

Sincerely,

Eric David Johnson

Responses to Eric David Johnson

EDJ-1 Comment noted. Alternative 10 has been moved into the main text of the SDEIS.

EDJ-2 Comment noted. All of the action alternatives included for detailed analysis in the SDEIS avoid the Honker Divide and Elevenmile areas to varying degrees.

EDJ-3 Comment noted. Please note that the timber to be harvested with the Control Lake timber sale does not represent "the last islands of old growth." For example, as noted in Table 4-37 of the DEIS, after the implementation of Alternative 8 (which would harvest 184 MMBF), over 75 percent of the old-growth that was considered suitable for harvest (under the 1991 TLMP SDEIS) in the Control Lake project area would remain unharvested. When one considers all forest land, both commercial and noncommercial, the Control Lake project area contains 158,582 acres, of which only 10,603 acres (or 7%) have been harvested to date (see Tables 3-12 and 3-14 in the DEIS).

EDJ-4 Refer to response to GRB-4.

EDJ-5 Refer to responses to EDJ-3 and GRB-3. Note that in the 1997 Forest Plan, the area of land use designations that does not permit logging has increased substantially over both the orignial Forest Plan (1979, as amended) and Alternative P of the 1991 TLMP SDEIS. Also note that the new Forest Plan in general, and the Control Lake project in particular, greatly expand the use of harvest systems other than traditional clearcutting.

Comments of Mark Kirchhoff

506 W NINTH ST
JUNEAU, AK 99801
11 DEC 95

DEAR MR POWELL:

MK-1 I'm writing this short note to urge you to seriously consider the citizen's alternative in the Control Lake Timber Sale Environmental Impact Statement. I would much rather see the timber going to small local cut's on a sustainable basis than in one large chunk to KPC. At the same time, the citizen's alternative will do a much better job in protecting fish and wildlife habitat than any other alternative. In closing, I see no reason to reward KPC for 30+ years of reprehensible corporate behavior at the expense of many of Pow's residents.

Thank you for your consideration.

Sincerely,
Mark Kirchhoff

USDA FOREST SERVICE
KETCHIKAN AREA
RECEIVED
DEC 15 '95
FOREST SUPERVISOR'S OFFICE

	INFO	ACT.	INFO	INITIAL
FS	(X)			
DFS				
FL & FC				
PAO				
AO				

Responses to Mark Kirchhoff

MK-1 Comment noted. Please note that Alternative 10 is being analyzed in detail in the SDEIS and that the Control Lake project will no longer provide timber to KPC under the long-term contract.

Comments of Marcel LaPerriere

Bradley Powell, Forest Supervisor
Ketchikan Area
Tongass National Forest
Attn: Control Lake EIS
Federal Building
Ketchikan, AK 99901

Dear Sir,

MLP-1 As the twenty first century approaches, and world population continues to expand at an expediential rate using resources wisely must become a priority. We as the guardians of the future have to slow down our insatiable appetite for all resources, including wood products. We can no longer be motived simply by short sighted greed, in order to make a quick buck. We must get the most out of every tree that we harvest.

I would encourage you as the Ketchikan Area Supervisor and the Control Lake EIS teem to look very carefully at the Prince of Wales Citizens Coalition alternative. I believe the POW Citizens Coalition alternative is on the right track to using our national forest resources much more wisely than past practices.

MLP-2 If the U.S. Forest Service would start supporting small scale operators and independent operators this would be a wiser use of trees. With proper planning, not motivated by the Alaskan Delegation, KPC or other large national timber companies the Tongass could truly support a sustainable timber industry. More jobs with less timber extracted would be the end result.

Thank you for considering my ideas.

Sincerely,

Marcel LaPerriere 10-11-95

Marcel LaPerriere
P.O. Box 9062
Ketchikan, AK 99901

c.c. SEACC

Responses to Marcel LaPerriere

MLP-1 Comment noted. Alternative 10 is incorporated into the text of the SDEIS.

MLP-2 Comment noted. The Control Lake project will no longer provide timber to KPC under the long-term contract; rather, it will be entirely provided for the Ketchikan Area Independent Sale Program under the provisions of the 1997 TLMP Revision.

Comments of Vicki and Adrian LeCornu

Vicki and Adrian LeCornu
Box 672
Craig, AK 99921
December 26, 1995

U.S. Forest Service
Attention: Mr. Bradley E. Powell
Forest Supervisor

Re: Control Lake Timber Sale.

Dear Mr. Powell:

VAL-1 We object to any logging plan that does not allow subsistence users their protections under ANILCA. As members of the Haida Tribe, we regard the sale as placing undue stress on a community that has born mostly negative affects from large scale logging, Logging in areas such as Prince of Wales Island, Dall Island and Long Island. These areas logged, are all due to the practices of the Forest Service, Sealaska Corporation and Klukwan Corporation.

Sincerely,

Vicki and Adrian LeCornu

Responses to Vicki and Adrian LeCornu

VAL-1 Subsistence users are being considered in the evaluation of alternatives for the Control Lake project and Section 810 of ANILCA is being implemented, as discussed in our response to SEAC-17.

Comments of Vicki and Adrian LeCornu

RESOLUTION

VAL-2

A RESOLUTION FROM THE HAIDA TRIBE

Whereas, the U.S. Forest Service has proposed a timber sale to take place in the Control Lake project area which is directly North of the communities of Craig and Klawock and directly West of the community of Thorne Bay, and

Whereas, a large portion of the Control Lake project areas comprises Land Use Designation III areas under the Tongass Land Management Plan, which specify that: "(t)hese lands will be managed for a variety of uses. The emphasis is on managing for uses and activities in a compatible and complimentary manner to provide the greatest combination of benefits.", and

Whereas, the purpose and need of the Control Lake timber sale is to provide timber for either the Independent Operator program, including Small Operators, or the long-term contract, and

Whereas, the Elevenmile area on the wester peninsula is part of the Control Lake project area and fulfills a service to the people of Prince of Wales as a traditional subsistence hunting and gathering area, and

Whereas the Upper and Lower Steelhead and Rio Beaver drainage have already been well roaded and therefore are accessible for Small and Independent timber Operators, who could not otherwise access said timber, and

Whereas the cutting unites in these well roaded areas may provide for the specific species, size and silvicultural needs of Independent and Small timber Operators, and

Whereas, the Honker Divide watershed is part of the Control Lake project area and fulfills a service to the people of Prince of Wales by providing a wildlife recharge area for the remainder of the island and offers high quality recreational opportunities, and

Whereas the people of Prince of Wales have formed a coalition called the Prince of Wales Citizen's Coalition and developed an alternative called the Elevenmile and Honker Divide Citizen's Alternative which intends to meet the needs of our local Small and Independent timber Operators while maintaining the integrity of our most valuable subsistence, recreational and wildlife habitat areas,

Therefore, be it resolved that the Haida Tribe respectfully asks that the U.S. Forest Service manage the Control Lake project area under the specifications of the Elevenmile and Honker Divide Citizen's Alternative.

Responses to Vicki and Adrian LeCornu

VAL-2 Comment noted. Please note that Alternative 10 is under active consideration. Also note that all action alternatives under active consideration avoid the Elevenmile and Honker-Divide areas from partly to completely.

Comments of Eric Lee

December 24, 1995

Dear Mr. Powell,

EL-1

I am a commercial fisherman living here in Petersburg, where I was born and raised. In my 30 years or so of subsistence in this rare and beautiful part of the world, I have seen a seemingly endless number of irreplaceable watersheds destroyed by clear-cutting. Once again, I am appalled that the Forest Service is planning large-scale clear-cutting right through the heart of a vitally important ecosystem.

Prince of Wales Island, which has already suffered the ravages of massive clear-cuts, desperately needs the Honker Divide region as it is to maintain ecological integrity in the northern part of the island. The value of the Honker Divide area for recreation, salmon production, tourism, and habitat for species not compatible with humans, cannot be overemphasized. It is priceless and irreplaceable.

No one in your position can help knowing that this is true. Therefore, I urge you to look within your heart and do what it tells you to do - to do all you can to insure the least damage

Responses to Eric Lee

EL-1 Comment noted. Please note that the 1997 Forest Plan Revision incorporates a series of Old-Growth Habitat areas. The Control Lake project area includes a number of these reserves, including a large one around the Thorne River and Honker Divide. Harvest cannot take place within them without a Forest Plan amendment.

Comments of Eric Lee

EL-1 (cont.)

comes to the land. Doing what you believe in has great lasting value. When you retire and look back at your career, you will have a sense of self-respect in knowing you did the right thing instead of being a major cog in the wheel that has caused so much ecological damage in our great forest.

EL-2

I urge you to see that the Alternative 10 is given equal consideration with the other alternatives in the Control Lake timber sale E.I. 5.. I urge you to speak out and build support for its merits. The AFHA report provide all the scientific backing anyone could need to justify preserving the ecological balance within the watershed. Please see that this alternative (10) is adopted in the final decision.

Sincerely,

Eric Lee

Responses to Eric Lee

EL-2 Comment noted. Alternative 10 is analyzed in detail in the SDEIS. Refer to our response to SEAC-26 regarding the implementation of AFHA recommendations.

Comments of Stephen W. Lewis

December 17, 1995
PO Box 84493
Fairbanks, AK 99708

Forest Supervisor
Ketchikan Area
Tongass National forest
Attn: Control Lake EIS
Federal Building
Ketchikan, AK 99901

Gentlefolk:

The following are my comments on the Control Lake timber Sale DEIS.

SWL-1 I am sorry to see that you eliminated the Citizen's Alternative, # 10 from consideration. It is perhaps the only alternative that will leave any room for a future harvest rotation in the area, and that will leave enough suitable habitat for wildlife to avoid future lawsuits regarding the Forest Service's promise to consider habitat needs of wolves and other species that were considered for listing recently. I believe that all of the alternatives being considered dramatically overharvest the area and will result in future economic and social problems, as well as potential imposition of regulations designed to protect wildlife that may further impair the social and economic fabric of the island.

SWL-2 The proposed harvest in the Honker area will eliminate the possibility of incorporating a large area of habitat as a future HCA, something that will have large negative effects on wildlife, and will seriously limit future options for management on Prince of Wales Island. Furthermore, upper Logjam Creek contains much

SWL-3 evidence of wolf activity not noted on your unit cards. This should be seriously examined before any of this area is considered for harvest and for road construction.

SWL-4 In terms of caves and karst, there is at least one major error in the DEIS. The DEIS claims in Chapter 2, page 33 of volume I, that none of the alternatives will have affects on any significant cave or karst features. This is incorrect. Harvest of unit 574-401 will adversely affect caves and karst located just below it. While the unit card correctly notes that caves and karst are located outside of the unit, it incorrectly suggests that karst located downslope of a harvest area will be unaffected. Chapter 4 , page 8 correctly notes that "Minimal long-term cumulative effects are dependent on the avoidance of unstable areas, effective use of buffers, and continued stabilization of erosion and runoff." (my emphasis) Runoff from the affected unit will pass through one cave and into the entrance of another. It will have unknown affects on the relatively small block of well developed karst in the area.

SWL-5 I appreciate the fact that unit 577-407 has been eliminated from consideration, perhaps because of its significant cave. However, a thorough karst inventory should be conducted in units 574-402, and 577-405, 406, 408, 409 and 410 before harvest or road construction is considered in this area. Please see the enclosed report on karst features in Upper Logjam Creek.

SWL-6 I assume that Unit 596-406 has been altered to avoid karst and caves.

SWL-7 Finally, I wonder whether including the Unit cards with cave locations noted is a good idea. We were easily able to locate many of the caves noted on the cards with little beyond said information last summer. Admittedly, it takes a bit of persistence, but there are a number of sensitive caves that could be located with the published information. This is especially true of unit 596-405, which was eliminated from consideration (thanks!). The karst and caves are described in detail, and, although the map is not included, it doesn't take a rocket scientist to locate an old map with the unit delineated.

SWL-8 Please, don't publish the descriptions of caves or locations included in this or the accompanying report in any published comments—although it would be worthwhile to print it with such references eliminated.

Thanks for considering these comments.

Sincerely,

Stephen W. Lewis

Responses to Stephen W. Lewis

SWL-1 In response to a number of issues, Alternatives 2 and 7, which had the highest harvest levels, have been dropped from detailed consideration. In addition, Alternatives 10 and 11, which have relatively low harvest levels have been included in the SDEIS. The purpose of this EIS is to evaluate each alternative in terms of its environmental effects. We believe the SDEIS alternatives provide for a wide range of harvest levels and environmental effects for review by the decision-maker.

SWL-2 Refer to Response to BBurdett-4.

SWL-3 Recent wolf tracking data provided by D. Person from Logjam Creek and Honker Watersheds has been incorporated into the design of Alternative 11 for the Final EIS. Alternative 11 addresses concerns for wolf by proposing limited harvest and road building in high value habitat identified by Person through radio-telemetry studies.

SWL-4 Thank you for this new information. The harvest unit noted in your comment is included in the unit pool, but is not proposed for harvest under two alternatives in the Final EIS. Table 2-3, Environmental Consequences of Alternatives, has been updated in the Final EIS to reflect that one harvest unit has the potential to affect significant karst features. The unit card has also been updated.

SWL-5 One of the harvest units of concern is not in the unit pool. The other harvest units are excluded from harvest under Alternative 11 of the Final EIS. The unit cards will be modified to identify the need for further karst inventory if these units are in the selected alternative.

SWL-6 CEC

Comments of Stephen W. Lewis

KARST FEATURES IN UPPER LOGJAM CREEK WATERSHED
Steve Lewis, Tongass Cave Project
THIS DOCUMENT CONTAINS CAVE LOCATIONS.
IT SHOULD NOT BE MADE PUBLIC OR DISTRIBUTED BEYOND THOSE WHO "NEED TO KNOW"

The inventory and survey work described here took place on 4 July, 1995. It was a follow up to original helicopter borne karst inventory performed during initial assessment for the Control Lake Project Area which had noted the presence of several caves in the area. Sergey Levachev and I hiked into the area from the highest driveable point on the 2000-520 road. From here we walked up and over the 1500 foot ridge and down into the headwaters of Logjam Creek. Continuing east, we climbed back up and entered proposed harvest unit 574-401. Just north of this unit we located the two caves observed by earlier inventory. These were in an area of highly developed karst which continued to the east and west, and for at least one hundred meters to the north. Due to time constraints, we were unable to delineate the boundaries of this karst. The karst was not as highly developed as we continued to the , and was not continuous, suggesting that small pockets of less highly developed limestone may be located for quite a distance to the east. Both caves were in the creek bed draining northeast from the muskeg to the east of proposed unit 574-401. We mapped one cave in the creek, Splash Cave. It resurged about 6 meters from the entrance and, at relatively low flow was the point from which most of the stream's flow emerged. It appeared unlikely that this cave could be "extended" by diving. Another cave approximately 100 meters downstream was not traversable without dive gear. However, it appeared to be quite short with a presumed exit only 10 meters downstream. At the observed water flow, this passage took the entire stream. Splash Cave has good potential as habitat for cave aquatic invertebrates although we were not equipped to sample for them. The cave is formed on a contact and is a very nice example of a resurgence, good karst development, and of a contact zone. It is unclear what the effect of harvesting 574-401 would be on the karst and caves below. Nevertheless, while the unit is not affected by the karst below, it is likely that the karst could be affected by changes in the unit above from which a large portion of its drainage may derive. It is clear that further examination of the units and their hydrology is in order.

The highly developed karst did continue to the north. for at least 100 meters. Sinks here were deep and at a high density, suggesting a well developed karst hydrology and perhaps cave system beneath. It is likely that this karst was 200 meters or more in width based on our observations to the west. It appears that the road as proposed, will cross highly developed and vulnerable units of karst. The road layout and its effects on the karst should also be examined before any harvest or road building plans are finalized.

We then followed a compass bearing just north of west, to the southern portion of proposed harvest unit 577-407. We walked through well developed karst for the entire way. Several proposed roads

Responses to Stephen W. Lewis

SWL-6 (cont.) The harvest unit of concern has been altered to avoid high vulnerability karst resources.

SWL-7 Unit cards do not reference specific cave locations.

SWL-8 Comment noted. We have deleted the location references from your comment letter.

Comments of Stephen W. Lewis

were laid out through this karst. The vulnerability of the karst and the effects of road construction should be assessed here too.

Pleasant Cave was located on a small knoll just above the lake on the east side of the unit, just south of the middle of the unit. Pleasant Cave is 22.05 meters in length. It has two entrances, one, a large walk-in entrance of phreatic origin, and the other, a fissure where the epikarst has developed through the ceiling. The cave is aesthetically pleasing, especially the walk-in entrance which overlooks the small lake. It provides fun, safe, and easy caving for anyone willing to get down and crawl a bit. We concur with Herron and Horrocks in believing that the unit should be dropped from consideration for harvest, and that the roads within it and those crossing adjacent well developed karst should be dropped or moved to avoid karst.

We did not follow the band of karst to the west from 577-407. However, there is a similar band of karst on the east facing slopes and top of the ridge west of this unit. A number of spectacularly well decorated caves are located in this area. Therefore, it is essential that further karst and cave inventory be undertaken before any harvesting or road construction begins in this vicinity. Besides those units already mentioned, the effects of harvest in 574-402, and 577-405, 406, 408, 409, and 410 on karst areas should be assessed. This means that the extent of the karst band should be mapped and inventoried for caves throughout its entire extent, not just in proposed units. Only then will it be possible to begin to assess the effects of the proposed management on karst and cave systems.

Responses to Stephen W. Lewis

Comments of Jennifer Lisac

December 22, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I was born and raised in Northwest Montana, where the timber industry has played as much a part in life as it does in Southeast Alaska. In the year in which I've lived in Southeast, I have come to see that there are many of the same concerns with the timber industry as there were in Montana. I have been supported by the timber industry for the majority of my life and I support it whole-heartedly.

I would like to take this time to express a few of my concerns and feelings regarding the way the Forest Service is trying to "govern" the timber industry. I am concerned that the Forest Service does not have my best interest at heart. I am also concerned that the Forest Service is listening more to special interest groups than they are to the local people who live and work in Southeast -- the very people who are affected most by the decisions being made.

JL-1 | I believe that this timber sale will in no way endanger the wildlife of Southeast Alaska. In fact, it helps them by increasing the underbrush and grasses for them to eat and hide in. I believe the timber harvest helps keep a balance between the soil, wildlife, and water resources of Southeast.

JL-2 | I support the harvest of timber in Southeast Alaska. I agree that we should log the most volume possible from the Control Lake Planning Area under the current Forest Plan. Not only will it keep balance with the natural resources, but it will also provide jobs, recreation, and hunting for the people who live in and visit Southeast Alaska.

Sincerely,

Jennifer Lisac
710 Carianna #2
Ketchikan, AK 99901

Responses to Jennifer Lisac

JL-1 Refer to Response to DRS-2.

JL-2 Comment noted.

Comments of David Martin

December 21, 1995

Mr. Brad Powell
Forest Supervisor
USDA Forest Service-KTN
Federal Building
Ketchikan, Alaska 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I have lived in Southeast Alaska for a number of years and as a citizen, there are comments I wish to include in the record for the above mentioned timber sale.

DM-1 First, this sale should proceed immediately with the alternative that would provide for the maximum harvest of 233 million board feet. As an employee in the timber industry, this issue is of prime importance to me and my family. We are the ones directly influenced by the decisions you make. We are the ones who feel the direct impact when the timber sales are insufficient to keep the industry in operation.

DM-2 Second, the one mile buffer zones in the Honker Divide or more than adequate to meet the needs of those who recreate there and enjoy the scenic beauty of the area.

DM-3 Third, Why do we have to place timing restrictions on animals that we are legally allowed to shoot? This makes absolutely no sense and is nothing more than a blatant attempt to further limit logging in the Tongass. You want to preserve the deer population, hire more enforcement officers to crack down on the widespread poaching in the area.
Sir, I am extremely frustrated with the inability of the Forest Service to provide for timber sales of an amount sufficient to sustain employment. Personally, I believe that the Forest Service does not want to see the timber industry remain viable in Southeast Alaska.

I challenge you to prove me wrong and do the correct thing by recommending the maximum harvest in the Control Lake sale.

Sincerely,

David Martin
Box 1026
Ward Cove, Alaska 99928

Responses to David Martin

DM-1 Comment noted. Effects on local communities and socioeconomics are considered in the SDEIS.

DM-2 Comment noted. However, the new Forest Plan Revision (1997) has established an Old-Growth Habitat Area around the Thorne River as well.

DM-3 The policy of the Tongass National Forest is to identify and manage sensitive species and their habitats to prevent the species from becoming threatened or endangered because of Forest Service management actions (1997 TLMP Revision). Timing restrictions are designated for species that, during a specific period of time, are very sensitive to a particular type of disturbance. Timing restrictions may be proposed for threatened or endangered species, USFWS species of concern or Forest Service sensitive species. In addition, numerous game species, such as Vancouver Canada Goose, also receive timing restrictions to keep these populations at harvestable levels.

Comments of John McCabe

Box 965
Petersburg, Ak
99833

Dec. 17, 1995

Dear U.S. Forest Service,

JM-1 I support Control Lake Citizen's Alternative (Alternative 10). It seems to provide a more sustainable yield over time (38 m.b.f. opposed to 187 m.b.f.). Honker Divide apparently has very high valued overall ecosystems and therefore needs protection – not clearcutting.

Alternative 10 seems to be an honest effort to blend in sustained logging yield with other forest user needs. It is going to be difficult to move away from huge, unsustainable clearcut tracts to smaller cuts that eventually protect and give stability to the logging industry.

Sincerely,
John McCabe

Responses to John McCabe

JM-1 Comment noted. Please note that Alternative 10 is now being considered in detail in the SDEIS. Also, all action alternatives avoid the Honker Divide area from partly to completely.

Comments of Matthew Meske

December 22, 1995

Brad Powell
Forest Supervisor
USDA Forest Service-KTN
Federal Building
Ketchikan, AK 99901

Re: Control Lake Draft EIS Comment

Dear Mr. Powell,

As a young adult who lives in Southeast Alaska I wish to have my comments included in the EIS for Control Lake.

MM-1 | I am in full support of the Control Lake Timber Sale. My last years income for college came directly from the timber industry. I could not expand my knowledge and further my career goals if it were not for the timber industry.

Please add my name as a supporter of the Control Lake Timber Sale.

Sincerely

Matthew Meske
P.O.Box 1445
Ward Cove, AK 99928

Responses to Matthew Meske

MM-1 Comment noted.

Comments of Mike Meske

December 22, 1995

Brad Powell
Forest Supervisor
USDA Forest Service-Ktn
Federal Bldg.
Ketchikan, Ak 99901

Re: Control Lake Draft EIS Comment

Dear Mr. Powell,

MM2-1 As a Forest Manager for a private timber company in Alaska I would like to express to you my full support for the Control Lake Timber Sale.

I have lived in Southeast Alaska for 12 years and have provided for my family and my children college education from the timber industry. We need to bring back to southeast the economic stability to the communities. The Control Lake Timber Sale will provide that stability to the communities on the P.O.W.

I see no impact that this timber sale has and give my full support for the Control Lake Timber Sale.

Sincerely,

Mike Meske

Mike Meske
Operations Mgr. Browning Timber
P.O.Box 1445
Ward Cove, Ak. 99928

Responses to Mike Meske

MM2-1 Comment noted.

Comments of Sandra Meske

December 22, 1995

Brad Powell
Forest Supervisor
USDA Forest Service-Ktn
Federal Bldg.
Ketchikan, Ak 99901

Re: Control Lake Draft EIS Comment

Dear Mr. Powell,

I have lived in Southeast Alaska for 12 years and consider Alaska my home. Before moving to Alaska we lived in the Pacific Northwest where the Spotted Owl uprooted our family. I see the same problems coming to Alaska that we experienced in Washington.

SM-1 I do not believe that the Control Lake Timber sale will have any impact on the deer population, tourism or any other excuse you may hear. The job loss, false statements, and extremist groups have made a impact on the communities in Alaska and we need to reverse that role and bring economic stability back to Southeast.

I give my full support to the Control Lake Timber Sale in knowing that the communities and our state will benefit from this sale.

Sandra Meske

P.O.Box 1445
Ward Cove, Ak. 99928

Responses to Sandra Meske

SM-1 Comment noted. Community stability is addressed in the 1997 TLMP FEIS and in the Control Lake SDEIS.

Comments of Ben Mitchell

RECEIVED JAN 10 1996

Dec 21, 1995 1/2

Regional Forester Phil Janik
USFS-R10

Subj: Control Lake DEIS
Public Comment

Dear Mr. Janik,

I am a USFS Retiree living in Sitka. Between 1965-1972 I was stationed on the South Tongass at Ketchikan. My duties were principly on R&W. I was preconstruction engineer on Thorne Bay to Point Baker mainline road and Control Lake to Klawock road. Also Harris River to Hydaburg road. I was a field going engineer and left tracks all over R&W. When I first arrived R&W east to west, north to south was virtually unbroken jungle. Not in our wildest dreams as we pursued our road location, that within three short decades this once magnificent island would have been logged at a rate far exceeding the ability to replace and logged with so much willful disregard for other resources in addition to timber. I am not proud now of my part in the rape of R&W.

BM-1 I am writing to express my strong support for the Citizens Alternative (Alt 10) as previously considered in the Control Lake EIS and adopted as the selected alternative in the final decision. I urge the F.S. to allow my grandsons generation to make the decision whether or not to harvest timber and road Honker Divide, and the other areas in the planning area

Responses to Ben Mitchell

BM-1 Comment noted. Please note that Alternative 10 is now being considered in detail in the SDEIS. Also, all action alternatives avoid the Honker Divide area from partly to completely.

BM-2 Please note that the 1997 TLMP Revision incorporates a wildlife

Comments of Ben Mitchell

2/2

BM-2 I demand that the USFS implement the best scientific information available on fish and wildlife and put into the practice the information and recommendations of the Viable Wildlife Population Committee Report for managing the remaining remnants of Prince of Wales Island and also the remaining remnants of the entire Tongass National Forest.

BM-3 I am well aware of the impediment to ethical management of the Tongass in the form of the Alaska Congressional Delegation. Those bastards have sold out to the two big timber corporations for the last three decades, and continue to do so. As proof, consider Stevens speech to Anchorage Chamber of Commerce on Dec 18 when by he objected to the proposed "salvage sale" plan for the Chugach NF was "wrong", and criticized the F.S. for logging right down to his "front door" in and around Anchorage. This is an outrage! ~~[illegible]~~ KPC and APC will not be connected with this salvage on the Chugach. He doesn't hesitate to cut to the door of Southeast communities for them. I request this be entered into the permanent planning record and be published in the final EIS involved.

Sincerely,
Ben Mitchell (USFS-Retired)
108 Darrin
Sitka, AK 99835

(Please Pardon the errors in this letter)

Responses to Ben Mitchell

habitat conservation strategy similar to the one developed by the Interagency Viable Population Committee for maintaining viable, well-distributed populations of wildlife species on the Tongass and the preferred alternative in the Control Lake SDEIS incorporates this strategy.

BM-3 Comment noted.

Comments of Ron Morman

Mr. Powell 12-22-9?

Please take a moment of your time and hear me out, man to man. Mr Powell I'm no politician lobbyist, nor do I belong to any special interest group. I'm just one man of many women and men trying to make a honest living, we ask only that our concerns be heard.

RM-1 I am writing you today because I feel that my way of life is in jeopardy. Mr Powell have you ever open up your mailbox & [illegible] have and it scares the hell out of you. A year and a half ago I was employed at our Ketchikan saw Mill. One night as I walked in to punch in for work I was met with a bunch of fellow workers with tears over their faces and fear in their eyes. I'll never forget that

Responses to Ron Morman

RM-1 Comment noted. The issue of local jobs and community stability is of major concern to the Forest Service. Also note that a new Forest Plan Revision has recently been adopted which incorporates a series of Old-Growth Habitat areas. The Control Lake project area includes a number of these reserves; harvest cannot take place within them without a Forest Plan amendment. Also please refer to response to DRS-2.

RM-1 (cont.)

night. On the bulletin board was a notice, it said tonight would be our last shift due to a lack of saw logs.
Mr. Powell these are men and women with families who love and respect the great land of ours, they are not out there to rape and destroy it. These are families who live, work, camp and work to insure its there for the future generations. Many men and women lost there jobs that night, forced to unemployment, welfare, state and federal aid. Mr. Powell this is not what I or want! Look upon us for a moment put yourself in these men and womens boots can you imagine going home and telling your family you're out of a job, its tough, damn tough. Many families lost homes, dreams were torn

RM-1 (cont.)

worse families torn apart.
Mr Gould if its in our power
please help prevent this from
happening again, get the facts!
We don't agree with the preferred
HCA strategy, scientist do not
have anything to back up
this plan. The timber sale
will have no positive impacts
to the [illegible] ecosystem.
In fact wildlife will benefit
from mud as more abundant food
source. The timber sale will provide
access for rough areas for
multiple use. More important
the stream and community
will benefit from improved
fisheries.
Please take into consideration
interest groups, to many non
decision and [illegible] family
farms into bankruptcy.

Sincerely
Ron Morman

P.O. Box 976
Ward Cove, AK 99928

Comments of Richard T. Myren

Forest Supervisor
ATTN: Control Lake EIS
Tongass National Forest
Federal Building
Ketchikan, AK 99901

Gentlemen or Madam:

The Forest Service staff drafters of the EIS discussing effects of logging upon fish resources and specifically the findings of Hicks, et al., on the Andrews experimental forest are to be commended. As you know, I have championed this cause for some time. In fact, because of the considerations I raised based upon Hicks et al. findings, the Chief's office directed the Alaska Region in response to my Central Prince of Wales Island appeal to validate its model of cumulative effects of streamflow (Enclosure #1). I am glad you are bringing this problem out and we can get along and face it together.

RTM-1

p. 4-32 According to my CPOW response dated November 30, 1993 to the Barton reply (Enclosure #2) marked long-term decreases in summer low baseflows will occur in every drainage tributary, once logged. The penultimate parsgrsph of my appeal criticism of Barton (Enclosure #2) succinctly expresses the problem. Enclosure #3 seems to tell us that the conventional model of Harr and other leading hydrologists employed to understand baseflows during droughts is incorrect and baseflows must be determined from the rates of evapotranspiration differences between (1) uncut forests, (2) the forest during logging and shortly after logging and, (3) the forests with longer term aftermaths following cutting composed of alders in some early stages and conifers in later stages.

Addressing the matter of low streamflows during droughts found in the DEIS pgs 3-40, 4-56 it is best to go bsck to the directive from the Chief's office response to CPOWFEIS (Enclosure #1 and enclosure #2). The Chief believes that the model "used by the forest is adequate to estimate the cumulative effects . . " of logging. I again state that the model is not adequate for the reasons stated in enclosure #2 and enclosure #3.

The Chief's office directed the RO to initiate a monitoring plan to validate the model being used to estimste the cumulative effects of logging on streamflow. Surely the Chief did not intend to delay the answer to this problem by a monitoring program which should take 15 or more years to begin to obtain answers when the answers are already available in the existing data? If long-term baseflow reduction occurs, which have been demonstrated by Hicks et al., as well ss argued in enclosure #2, then the Forest Service model cannot be sustained. I also argue this through a demonstration by the model developed from diurnal variation in baseflows at Staney Creek (enclosure #3). During summer,droughts any alternation of vegetation cover will, according to my model, produced a corresponding change in evapotranspiration and a subsequent change in baseflow.

The fundamental flaw in all Forest Service arguments about baseflow during droughts to date is an assumption of a threshold, which, if cutting does not exceed, then negative effects cannot not occur. This threshold percentage has ranged from 28% to 35% according to the Forest Service. There are two major objections about a limit to the amount of logging until effects on baseflow are observed.

Responses to Richard T. Myren

RTM-1 Validation monitoring of the Forest Service cumulative effects model is continuing. Hicks et al. (1991) is fully discussed in the Draft EIS and potential effects on low flow are evaluated and considered to be minimal (pages 4-31 and 4-32). Further evaluation of these concerns will occur; however, this is not done on an EIS by EIS basis.

Appendix E summarizes watershed assessment efforts used in the Control Lake project. One hundred and sixty-seven watersheds were analyzed in the Soils Resource Report and the Fisheries and Watershed Resource Report. These analyses included riparian conditions, potential for stream temperature increases, reductions in large woody debris recruitment, fish habitat conditions, water quality, sediment erosion (road and surface), mass wasting hazard, sediment delivery potential, and likely road traffic volumes. The 167 watersheds analyzed in the Control Lake Project area were consolidated to varying degrees in the DEIS and SDEIS depending on the type of analysis (e.g., 70 watersheds in Table 3-5 and 30 watersheds in Table 4-8). Watershed evaluations were conducted for all 3rd order drainage basins (regardless of size) that drained to anadromous or resident fish streams. In addition, the analyses performed for the EIS also considered the observations that were made during field work for the entire unit pool, including harvest units that were dropped or deferred (see response to SEAC-26). The level of development that had previously occurred in the various drainage basins in the Project Area was also considered.

Comments of Richard T. Myren

RTM-1 (cont.)

(1) The diurnal variation of baseflow at Staney Creek (Enclosure #3) suggests evapotranspiration 15 years after logging is intense. If this rate is higher than before logging as it seems to be at Staney Creek from the 1965-1966 comparison before logging then the consequences for fish habitat during droughts when baseflow maintains streamflow are very serious. I have calculated the change in baseflow (see Table 3 of Enclosure #3) which suggests that only a small increase in evapotranspiration is necessary to reduce baseflow. For example, if 60% of the forest is cut and in higher rates of evapotranspiration due to second growth effects (alder and/or conifers) then an increase in evapotranspiration of only .95 area-inches over the 120 day period is required. If the 2 area-inches assumption of Dan Bishop model for second growth is used only 28 % of the forest need be cut.

(2) The second objection to the Forest Service modsl is because streamflows might appear constant as measured at a downstream gage. But flows upstream of the water gage in distant tributaries may be vary erratically in their relative contribution of flow at the downstream water gage depending upon how much of the watershed of the tributary was cut and the age and composition of the vegetation. The effects may therefore be disastrous to upstream fish habitat while the downstream water gage is reporting little effect. In the watersheds of the individual tributaries which have been logged several years ago streamflows may be decreasing while increased streamflows sustained by new cutting may make the flow at the gage appear relatively constant (See Hicks et al., and Enclosure #3).

P. 31-4. See the above criticism about levels of streamflow in forests of different ages. I refer you to my paper again (Enclosure #3) which argues that the only way of knowing what baseflows are during droughts is by knowing the amount of evapotranspiration (rates x area in different states of succession) during the period of the drought. Again, if evapotranspiration has changed because logging on the watershed and if the entire watershed has not been clearcut it is then unlikely that streamflow records measured at the outlet of a watershed system will ever accurately measure effects of logging upon baseflows on individual tributary streams within the watershed.

The Staney Creek record appears to be showing that 15 years after logging evapotranspiration rates are increasing because of the new populations of alder or young conifers. A record of continuing development of rates of change in evapotranspiration will be destroyed if new cutting is allowed and baseflows increase. (Is this a game that the Forest Service has been playing with us all these years?)

Because of the importance of the Staney Creek record I am recommending no more cutting be allowed on the watershed. The maintenance of the historical record of baseflows in a watershed recovering from logging activity outweighs any further activity, such as logging or road building, that could alter and confuse that record, in my opinion.

p. 31-4, last paragraph and reference to the Meehan, Farr, Bishop and Patric publication (MFBP). The Barton Reply to my CPOW appeal regarding the veracity and competence of the MFBP publication stated,

> . . . The Appellant claims that "Meehan et al., was wrong" (Appeal, P. 11). Judging by common accepted standard, the research done by Meehan et al., (1969) on the Harris River is

Responses to Richard T. Myren

Comments of Richard T. Myren

RTM-1 (cont.)

considered to be adequately reviewed science. This study was presented at a public symposium sponsored by several organization and then published by the American Institute of Fishery Research Biologists. We respect the Appellants's opinion as a scientist, but a dispute between experts doea not invalidate the EIS or information used. The information and recommendations obtained from CPOW Project IDT subject apecialists is considered reliable and is sufficient for a reasoned choice among alternatives."

This statement must be corrected. If the Forest Service obtained the subject material in the previous quotation from Dr. Meehan then Dr. Meehan has lied. The symposium referred to I organized in 1968, with the help of others, and there was no presentation by Meehan of : (1) suspended sediment, (2) that effects of logging were capable being detected using escapement and larvae comparisons, and (3) other important matters. I don't have the time now to go into the errors in this publication which nearly overcomes ones ability to comprehend them. Furthermore, one of the peer reviews of the manuscript leading to MFBP stated the suspended sediment analysis should make comparisons by censuring the data past 2115 cfs so that during and after logging suspended sediment could be compared over the same range of streamflows as the before logging baseline in which flows did not exceed 2115 cfs. MFBP ignored this comment and used flows exceeding 5000 cfs, and a covariance analysis which, if the data were adequate, could have done the same job and perhaps better than data censuring if the data were adequate. The data were not as desirable as they should have been as MFBP states so the analysis was poor quality even at the outset. Furthermore, the use of quadratic relations assured that nothing could be detected between logging and unlogged periods.

RTM-2

I refer to other problems in MFBP Enclosure #4, Did the Forest Service care about fish resources on the Tongass?.

Meehan should be ashamed of the MFBP publication. The Forest Service does an injustice to its self and to the credibility of any argument or justification it attempts to advance by citing MFBP.

RTM-3

p. 32-4, 5th paragraph, first three sentences. Enclosure # 3 indicates long-term decreases in late summer baseflows flows will increase by the time 28 % of the forest is cut, assuming that the Bishop model of 2 area-inches of evapotranspiration is added. If the increase in evapotranspiration is less then more than 28 % of the forest need be cut (See Enclosure #3, Table 3.

RTM-4

pg. 3-40, 4th para.: Everest et al did not find pink and chum affected by sediment inconclusive (See Everest et al., figure 6). And Everest et al., does not present a "similar review" to Pella and Myren (PM).

RTM-5

Same para.: The Forest Service is to be congratulated that the draft EIS recognizes the Hollis studies reported by Sheridan and McNeil (1968) (SM) and MFBP were inconclusive as Pella and Myren demonstrated rather than the interpretation that inconclusive studies meant no effect and which then allowed the continuing of published claims of these studies that logging did not appear to be adversely affecting pink and chum salmon production. I refer you to the enclosure #4. I argue that an active attempt at misinformation to justify logging activities by the Forest Service was begun in the 1960's by the Forest Service. I argue in the attachment that Dr. Pella and me fell into this trap unwittingly. We and had been used and there was more substance to adverse logging effects than SM and MFBP wanted to report. Data was intentionally misinterpreted in SM and MFBP, Salo's publication was neglected, and data was missing (See Enclosure 4, pages 1 - 5).

Responses to Richard T. Myren

RTM-2 Your disagreement with Meehan's publication is noted.

RTM-3 See response to RTM-1.

RTM-4 Your continuing disagreement with the statements in the published documents is noted.

Comments of Richard T. Myren

RTM-5 (cont.)

Because of multiple errors in SM and MFBP the citing of such publications hurta any argument or atatement supported by findings published in these two papers.

RTM-6

Page 46-3,

> . . . . Studiea have been conducted on Southeast Alaska pink salmon, including the relationship among stream sediment egg survival, and pink salmon returns to streams (Sheridan et al., 1984, Pella and Myren, 1974, Sheridan and McNeil, 1982). The studies have established no relationship between upland management and escapement. Food source, predators, offshore and nearshore commercial fish harvests, water temperatures, and many other factors influence ocean survival"

What nonsense, as established in all of the above before the quote. I addressed Pella and Myren in the enclosure #4 and discuss what the meaning of the PM analysis was, and ita miainterpretation by those who wished to cloud the effects between salmon production and logging.

RTM-7

I also assume that the Sheridan and McNeil 1982 paper cited on page 46-3 is the 1982 analysis of Sheridan on file with the Forest Service prepared just before Sheridan retired. This paper was reviewed by Dr. Jerry Pella of the Auke Bay Laboratory. Sheridan simply analyzed the escapement data and concluded that Pella and Myren were right, after all.

I fought Sheridan throughout most of my professional life during my non-employment hours while employed at the Auke Bay Laboratory and his employment with the Forest Service. Both argued that escapement data were effective tools to detect logging effects. Sheridan gave the Forest Service position credibility. For example, at the 1970 Sierra Club trial he produced an affidavit which stated that escapements were useful in detecting logging effects and assessing the "health" of the runs. I took a lot of heat on it before, during and after the trial. The Forest Service people were like a phalanx of roman soldiers, loyal to their master, the Forest Service, loyal beyond rational calling. One would have thought the righteousness of their position had been engraved by God in stone. And when I confronted Sheridan on the issue I got a letter from the then Regional Forester Charles Yates, written by Sheridan, suggesting that perjury need not be committed when two opposing sides make statements sworn under oath. I had said merely that I had presented sworn testimony (at the 1970 Sierra Club vs. USPC and the Forest Service trial) that escapement methods of the Forest Service to detect effects were insensitive. Sheridan once replied through Yatea about this,

> . [a] statement is merely the opinion of the individual. Others could make an opposite statement based on their beliefs and not subject themselves to a claim of perjury"

Had Sheridan honestly believed in his sworn affidavit or had he prepared it just to keep his job or position? Upon his retirement he switched his tune! The arguments that escapements were sensitive measures of logging effects had a history of application and destruction spanning nearly two decades. It was a practice to justify logging that appeared in nearly every Forest Service draft and final EIS. Now this was all swept away by Sheridan recanting? What about the damage that occurred to the fishery resource during this period? I believe Sheridan knew of the insensitivity all along. His cohort, Bill McNeil stated it better than I had and in 1964 or six years before the trial,

> . . .It is unlikely that the effects of logging on pink and chum

Responses to Richard T. Myren

RTM-5 Comment noted.

RTM-6 Your continuing disagreement with the statements in the published documents is noted; however, the way they are referenced is correct and relationships between upland managment and escapement are not used to make conclusions in the Draft EIS. The information you provided in this and previous projects has been used along with such indicators as past harvest, riparian harvest, road density, and potential sediment delivery to provide information to the public and decision maker.

RTM-7 See response to RTM-6.

RTM-8 See response to RTM-6.

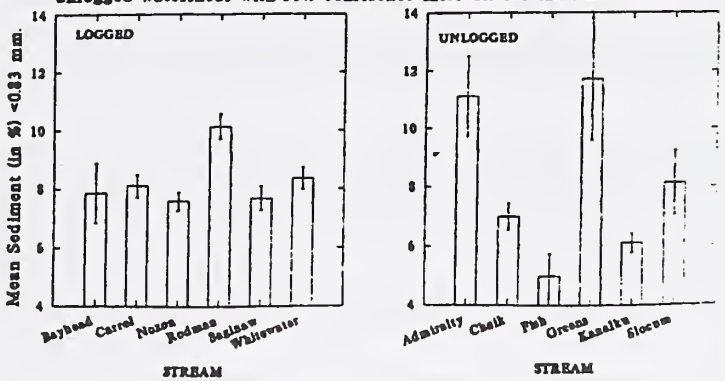
RTM-7 (cont.)

salmon will ever be fully evaluated, for full evaluation implies that the impact of logging on the salmon resource can be quantified. Even under completely natural conditions, stocks of pink and chum salmon undergo wide fluctuations in abundance; and the survival of young salmon in spawning beds varies greatly from year to year. Survival is affected by a host of interacting factors, some of which could not be influenced by logging."

This statement was the essence, plus more, indeed more competent than my statement on the witness stand at the 1970 trial!

Bill Sheridan was once a scientist, then claimed later to be a scientist. Sheridan knew by measuring logging effects by escapement he could hide the effects of logging! If he did not honestly know it after 1974 he should have because of the publication of Pella and Myren.

Figure 1. Mean values of percent sediment <0.83 mm for logged and unlogged watersheds with 95% confidence intervals for the means.



RTM-8

There is another reference on page 46-3 to Sheridan. In Sheridan et al., 1984, a symposium paper carrying four junior authors along with him, Perensovich, Faris and Koski who apparently did not read nor understand what Sheridan had written and what they had signed. Table 3 (of their paper, Enclosure #5) shows a comparison of unlogged and logged stream fine sediment composition and an ANOVA is preformed with considerable wordy descriptions of the various results Enclosure #5. It concluded the difference in sediment in the logged and unlogged streams was not significant. It is total error because the basic testing conditions of ANOVA were broken at the outset of the test which required that the variances must be homogenous between the comparisons of the streams in logged and unlogged watersheds. The variances certainly are not adequate for the comparisons as shown in table 3 and in figure 1 which I prepared from the data presented in table 3 the paper. If the reader doesn't understand that which apparently the junior authors did not them look at a graph of the comparisons as shown in figure 1.

Of course the mean sediments were not significant with the high variability of the unlogged group. The two means 9.1 and 9.65 are comforting only in Table 3 (Enclosure #5) but the 9.65 signifies no useful information because of the

Comments of Richard T. Myren

RTM-8 (cont.)

variability of natural stream systems. The graph shows that indeed, contrary to the authors conclusions ssdiment levels were indeed different in unlogged streams and some of them were much lower (Chiak, Fish and Kanalku). Logging a watershed increased the amount of sediment as shown for the logged streams. (I think there are good reasons to suspect why this is so because of the channel destruction following logging and the different sediment routing relations for logged compared to unlogged watersheds. I suspect that several of the logged streams had sediment levels comparable to the low sediment level unlogged streams).

Sincerely,

Richard T. Myren
3320 Fritz Cove Road
Juneau, Ak 99801
December 22, 1995
file__control3

Responses to Richard T. Myren

Comments of J. Troy Olivadoti

12/22/95

Brad Powell
Forest Supervisor
USDA Forest Service-KTN
Federal Building
Ketchikan, Alaska 99901

Control Lake Draft EIS Comments

Mr. Powell,

JTO-1 I am writing this letter to voice my support of timber harvest in the Control Lakes area. I believe Alternative 2 satisfactorily balances the need to protect the ecosystem and helps insure the stable economy we in the Ketchikan area enjoy. Alternative 2 will help small operators by providing access to future timber sales, and provide jobs for independent loggers and small mills. Also recreational opportunities will be enhanced by better access for hunters and fishermen.

JTO-2 I am opposed to the proposed HCA strategy. Being a scientist, I know that the current HCA plan is not based on sound scientific data, but on emotion and rhetoric from special interest groups. Until factual data exist to back up the HCA technique for species protection, it is irresponsible to suggest that they be included in any USFS timber sale.

My wife and I are directly supported by the timber industry in Southeast Alaska. Our home, food, cars, and recreation are all paid for with money earned by working in the forest products industry. We came to Alaska from Southern Oregon. We lived through the devastation the Spotted Owl decision brought on that area. Our friends and family all paid for this decision in the Northwest with their homes, their security, their happiness, the hope for a future in the rural towns they grew up in and loved. I read the accounts of how the decision was made to adopt Option 9. It was, in a nutshell, directed by radical environmental interests. We do not want a repeat of Option 9 in Alaska. The vast majority of Americans, especially Westerners, are not in favor of destroying peoples lives and the economies of regions. The vast majority of Americans do not share the ideals of this small but well financed and loud radical environmental group.

Mr. Powell, we live, play and work here. We are very thankful for the jobs and the country surrounding us. We have much more at stake than any outside group ever could. This is our home. No one wishes to destroy their home. I think the forest management in Southeast should be held up as a great example how man an nature can coexist and thrive. We must do everything we can to sustain this industry that is an integral part of Southeast.

Thank you for your time,

J. Troy Olivadoti

Responses to J. Troy Olivadoti

JTO-1 Comment noted.

JTO-2 Comment noted. Please note that a new Forest Plan Revision has recently been adopted which incorporates a series of Old-Growth Habitat areas. The Control Lake project area includes a number of these reserves; harvest cannot take place within them without a Forest Plan amendment.

Comments of Norm Olmschenk

Bradley Powell:

NO-1 The Forest Service is the worst enemy that the Tongass forest could ever have.

If you have a conscience, I suggest you listen to it and bury your evil policies in the Tongass to an end. The only thing the Forest Service cares about is wrecking virgin forest lands. You want to get out the cut, this in turn brings that section of forest under "management". That in turn means hiring more people to "manage" it and the Service bureaucracy is thus allowed to grow. This endenses promotions. I say again, Follow your conscience and leave the Tongass alone.

Norm Olmschenk

Responses to Norm Olmschenk

NO-1 Comment noted. Please note that the no action alternative is one of the alternatives under active consideration. Also, please note that the Forest Service is a land management agency, guided by the National Forest Management Act. Timber harvest is one of the management activities the Forest Service conducts on the National Forest System lands. The new Forest Plan for the Tongass (TLMP 1997) includes more lands protected from timber harvest than ever before. Substantial additional protections are included in the Control Lake project area.

Comments of Bruce C. Paton

BRUCE C.PATON,M.D.

5380 East Mansfield Avenue, Denver CO 80237, 303-692-8225 (p&f)

December 20, 1995

Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan AK 99901

Phil Janik
Regional Forester
PO Box 21628
Juneau AK 99802-1628

Re: Forest Service Plan for Prince of Wales Island

Gentlemen:

BCP-1 I write in opposition to the prosed Forest Service plan for parts of Prince of Wales Island. The plan ignores community interests at the expense of increased commercial interests, and increases loss to the American taxpayer.

Politically we are trying to do two things : reduce government impingement on the lives of private citizens and reduce the budget. This plan seem to go directly in the face of these two objectives.

The plans for South East Alaska are not only of interest to the people who live there. In today's Denver Post there was an editorial that relates precisely to what is happening in the National Forests of your area. I believe that opinions of this sort should be strongly taken into consideration in making future plans for the use of our land

Yours sincerely,

Bruce Paton

Bruce C.Paton

Responses to Bruce C. Paton

BCP-1 Comment noted. Please note that the long-term contract with Alaska Pulp Corporation (referred to in the editorial) has been terminated for several years and that the long-term contract with Ketchikan Pulp Company (KPC) will now terminate in 1999, 5 years earlier than originally scheduled. Further, please note that none of the timber from the Control Lake project will be supplied to KPC under the long-term contract.

Founded 1892
DENVER POST
12/20/95

Steve Hesse, *VP Circulation*
Vernon Mallinen, *VP Marketing*
Allen J. Walters, *VP Advertising*

Congress has no mandate to despoil the environment

Bill Clinton is winning political points because the GOP leadership is letting some Republicans attack Mother Nature.

Proposals the president vetoed this week included plans to emasculate wetlands preservation and to prohibit agencies from adding animals or plants to tbe endangered species list.

In some cases, the vetoed provisions actually might have increased government spending because of litigation costs and management inefficiencies. Worse, they would have permitted degradation of public resources for little or no widespread benefit.

It's one thing for the GOP to sincerely try to curtail public spending. But it's an entirely different matter to use the budget debate to advance tbe narrow interests of political contributors at taxpayer expense.

The most striking example is the fight over the Tongass, a rare North American rain forest that sprawls across southeast Alaska. A few years ago, Congress approved a compromise plan to permit some logging there.

The existing plan already costs the federal piggy bank plenty. On average, the U.S. Forest Service has lost $40 million a year selling Tongass timber. Most of the Tongass timber is cut by Japanese companies, with the raw logs exported to tbe Far East. Environmentalists and taxpayer watchdogs didn't like the compromise, but politically it was the best deal they could win at the time.

Now the situation could grow far worse. U.S. Sen. Ted Stevens, an Alaska Republican, wants to undo tbe existing agreement and offer even bigger giveaways. His measure would require the Forest Service to allow even more widespread and potentially destructive logging in the Tongass. It also would bar citizen input into the forest management process.

If Congress adopts Stevens' proposal, America could commit the same sins against its own rain

ations bill, congressional Republicans ultimately went along with his plan.

When the bill hit the president's desk, Clinton tbus had a readymade excuse to veto the measure and so win public applause.

GOP acquiescence to Stevens' demands proved to be not only absurd economics and dangerous environmental policy — it also turned out to be stupid politics.

When voters gave the GOP control of Congress, they were signaling a desire to decalcify the system. But Republicans should not misread the mandate as a call to dispose of some popular policies — including the formerly bipartisan consensus on environmental protection.

Indeed, tbe GOP has handed extraordinary control of America's public lands and environmental policy to the Alaskan congressional delegation, which has one of tbe worst collective environmental records in Washington.

Stevens beads the panel tbat oversees fisheries and oceans, yet the League of Conservation Voters rates him a paltry 8 on a scale where 100 is a perfect score.

His senate colleague, Frank Murkowski, last year earned a rating of zero from the same broad-based environmental coalition. He now steers the crucial Energy and Natural Resources committee.

Alaska's voice in the U.S. House, Don Young, is in cbarge of a panel on oceans, fisheries and wildlife; be also scored a zero on environmental matters in 1994.

Certainly tbere are Republicans with far better records. Among them is Colorado's own U.S. Sen. Ben Nighthorse Campbell, who last year earned a 62 for his pro-environmental votes.

By installing environmental laggards in key posts, the Republicans have shown a collective disdain for voters, who, according to opinion polls, consistently have asked for stronger [illegible] protection, not weaker. GOP leaders now must answer public[illegible] for tbese committee selections

Comments of Julie Hammonds Penn

Julie Hammonds Penn
P.O. Box 22474
Juneau, Alaska 99802
pager (907) 789-8302

December 18, 1995

Mr. Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan, AK 99901

Re: Proposed Control Lake Timber Sale

Dear Mr. Powell:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the proposed Control Lake Timber Sale. Public involvement in the Forest Service planning process is vital to the continued health of the Tongass National Forest, our forest home.

JHP-1 | First, let me commend the planning team for the months of exhaustive research that culminated in the Control Lake DEIS. I am the author of several EIRs for projects in the State of California, and I well know the labor that goes into a lengthy technical document of this type.

Given the sheer volume of information to be presented, it is not surprising that there are a number of minor errors in the text. I have listed those errors I found in the Summary on a separate page (see attached) and I trust that they will be amended in the Final EIS.

Regarding the broader questions raised in the DEIS, I would like to make several points. (Please note that where I refer to specific pages in the DEIS, I use the chapter and page numbers joined by a dash; DEIS 4-26 refers to chapter 4, page 26. Also, following the DEIS I use the term "action alternatives" to mean Alternatives 2, 7, 8, and 9 only.)

The Project Description

JHP-2 | The two-part project description illuminates the double-bind in which the Forest Service is caught. On the one hand, the Ketchikan Pulp Company's long-term contract demands a large and steady supply of old-growth timber. On the other hand, the Forest Service must move toward the "desired future condition" identified by its long-term planning process (a process which must take into account the needs of a variety of forest users and the Forest Service's mandate to provide for multiple uses). The project description depicts these goals as harmonious; to provide wood to KPC while

Responses to Julie Hammonds Penn

JHP-1 Comment noted.

JHP-2 Comment noted. Note that the pulp mill has been closed by KPC and the long-term contract has been mutually modified to supply the KPC sawmills through 1999.

Comments of Julie Hammonds Penn

JHP-2 (cont.) optimizing the forest for all users. However, the DEIS proves that these goals are not harmonious. Logging activities decrease the value of the forest for subsistence hunters and recreationalists in search of a natural experience. Extensive logging is incompatible with the maintenance of healthy populations of large predators such as wolves and bears, and of game species such as Sitka black-tailed deer.

I cannot believe that the desired future condition of this forest is sterile second-growth timber which fails to maintain adequate populations of game animals and to provide acceptable areas for recreation. I think the DEIS should confront the dichotomy inherent in its project description. Is it possible to continue to serve the KPC contract while managing for multiple uses of the forest? If it is not, then the law clearly requires the Forest Service to give priority to its multiple-use mandate over the requirements of the KPC contract.

JHP-3 The other problem with the project description is that it unfairly limits the analysis of alternatives. Five alternatives are considered, while five others are rejected because "they do not meet the stated purpose and need of 187 mmbf." In other words, the KPC contract is driving this project. If management for multiple use were of equal priority with "getting out the cut," as assumed in the project description, these rejected alternatives would have been considered at the same level of detail as the proposed action alternatives. The action alternatives considered in the DEIS, after all, meet the KPC objective but not the objective of providing for multiple uses without impairment; alternatives that provide for balanced multiple use but do not meet the requirements of the KPC contract should likewise be considered.

JHP-4 Specifically, I am intrigued by Alternative 10, presented by the Control Lake Citizens' Coalition. Surely this represents the ideal in terms of public involvement in the forest planning process. The people who developed this alternative represent a variety of interests, from recreationalists to independent timber operators. Their alternative provides for logging activities while protecting the interests of all who live in and use the forests of Prince of Wales Island. Alternative 10 should be fully considered in a Supplemental EIS. It protects valuable wild lands and resources while providing for the development of a community-based timber industry. Such an industry would consist of small businesses dedicated to creating more local jobs per tree cut and to manufacturing finished products instead of exporting raw materials. I believe that once the Forest Service considers Alternative 10 in a Supplemental EIS, this should be the selected alternative in your final Record of Decision.

The Impacts of the Project

It is clear that this project will have effects on the environment which are unacceptable. As described in the DEIS:

JHP-5 *1) The project will reduce the quality of fishing available within the Project Area*

The most egregious oversight in the DEIS is the omission of results of the Forest

Responses to Julie Hammonds Penn

JHP-3 Because of the change in the purpose and need for the project (see Chapter 1 of the SDEIS), the list of alternatives analyzed in detail has been modified. The range in harvest volumes and associated environmental effects is quite wide.

JHP-4 Note that an SDEIS has been prepared and Alternative 10 is included as an alternative being analyzed in detail. Your comment regarding preference for Alternative 10 is noted.

JHP-5 See responses to SEAC-26 and SEAC-36.

Comments of Julie Hammonds Penn

JHP-5 (cont.) Service's *Anadromous Fish Habitat Assessment*. The AFHA determined that stronger measures are necessary to maintain healthy populations of anadromous fish in the Tongass, and to protect these populations from the effects of logging. A Supplemental EIS should be prepared which fully implements the recommendations of the AFHA in mitigation measures applied to every action alternative.

JHP-6 Under all action alternatives, a road and trail are planned for Angel Lake, and logging will occur nearby. Angel Lake is currently unharvested and unroaded. Angel Lake supports four species of salmon, three trout species, and Dolly Varden char, "all of which may be vulnerable to increased fishing pressure." (DEIS 4-44; App. D-3 p. 4) I urge the Forest Service to protect Angel Lake from overfishing by rejecting any alternative which allows road access and timber harvest near the lake.

JHP-7 Roads and logging are planned near Shinaku Lake. Shinaku Lake is one of three lakes on Prince of Wales Island stocked with arctic grayling. The lake also supports three species of salmon, three trout species, and Dolly Varden. Currently the only access to Shinaku Lake is by float plane. Fishing on Shinaku Lake would be encouraged by new road access, increasing harvest and risking overfishing of the area. (DEIS 4-44) I urge the Forest Service to protect Shinaku Lake from overfishing by rejecting any alternative which allows road access and timber harvest near the lake.

JHP-8 There are only two trails in the Project Area, the longer of which is the Rio Roberts trail (.75 mile). This trail provides access from State Highway 929 to a fish viewing platform overlooking a fish pass on Rio Roberts. The Forest Service plans to build a road over the trail leading to a harvest unit "near" the viewing platform. The Forest Service plans to mitigate this action by creating an interpretive program illustrating forest harvest practices (also DEIS 3-201, 4-217, 4-226). I thought this was a joke when I first read it. I urge the Forest Service to reject any alternative which includes this road and timber harvest unit.

JHP-9 *2) The project will reduce the quality of subsistence hunting available within the Project Area*

The DEIS states that existing habitat cannot provide enough Sitka black-tailed deer to support current levels of hunting; in simpler terms, even now more deer are being killed than the land can support. "At some time in the near future it may be necessary for the Federal Subsistence Board to restrict the number of deer harvested by non-rural hunters to leave adequate numbers of deer for a subsistence users." (DEIS 3-159) The residents of Ketchikan who hunt on Prince of Wales Island will be happy to know that this action is not within the jurisdiction of the Federal Subsistence Board; however, the appropriate regulatory agency may soon be forced to restrict or eliminate their hunting rights.

In the future, deer habitat will decrease by a "significant amount" under the action alternatives. There is "a significant possibility of a significant restriction" of the subsistence use of deer by residents of Coffman Cove, Craig, Hydaburg, Klawock, Thorne Bay, and Whale Pass. (DEIS 4-166 ff.) This possibility exists even if restrictions

Responses to Julie Hammonds Penn

JHP-6 Comment noted.

JHP-7 Comment noted.

JHP-8 Comment noted.

JHP-9 The subsistence analysis in the SDEIS is substantially different from that given in the DEIS because:

1) several of the action alternatives are different; 2) cumulative effects projections for the project area are not as severe because of changes to more protective LUD's in the 1997 TLMP Revision; and 3) the analytical methodology has changed somewhat. The range of alternatives presented in the SDEIS is clearly adequate to allow for a reasoned decision that considers a wide range of subsistence effects.

Comments of Julie Hammonds Penn

JHP-9 (cont.) are placed on hunting by Ketchikan residents. (DEIS 4-179) The Forest Service is required to provide for subsistence hunting as well as logging; not one of the proposed action alternatives meets this requirement.

By the year 2054, marten habitat will decrease by 67%, black bear habitat will decrease by 52%, and deer habitat will decrease by a significant amount in the Project Area. (DEIS 4-165, 4-181) By the year 2054, black bear habitat would be about 20% of that needed to support harvest, marten habitat would be about 17% of that needed, and deer habitat would be about 6% of that needed. (DEIS 4-165, 4-181). It is evident that under the proposed alternatives, harvest of these species will be reduced or eliminated and maintenance of healthy populations of these species cannot be assured. The Forest Service is elevating logging above other uses of the forest, which contravenes its multiple-use mandate.

JHP-10 Klawock hunters say that the Elevenmile area is historically important to them. "The greatest value to them is being able to experience the hunt, and the land, in the same way as their ancestors." (DEIS 3-153) "Extensive harvest along the Elevenmile shoreline under Alt. 2 would produce significant impacts on traditional subsistence users of this area." (DEIS 4-162) This impact is unacceptable. The alternatives which allow harvest in the Elevenmile area should be eliminated from consideration.

JHP-11 The DEIS shows that all action alternatives will result in restrictions to non-subsistence hunters and trappers and in competition between subsistence use groups for scarce animals. For these reasons, Alternative 1 (the No Project Alternative) should be selected.

3) The project will reduce the quality of recreation available within the Project Area

JHP-12 The DEIS recognizes the value of recreational opportunities in the Project Area and their dependence on scenery, wilderness, wildlife and solitude. The Thorne River/Hatchery Creek waterway, also known as the Honker Divide, is especially important to recreational users of Prince of Wales Island. The Honker Divide canoe trail is of national significance, eligible for inclusion in the National Wild and Scenic River system "as the result of having four outstandingly remarkable values.... fish, wildlife, recreation, and scenery." (DEIS 4-222)

Logging will occur in as many as 25 harvest units only 1/4 mile from the river in an area available for Scenic River designation (DEIS 4-222). "Harvest activities would negatively affect two of the four identified outstanding remarkable values (recreation and wildlife) of the river." (DEIS 4-222) This severe impact to a recreation area of outstanding national importance is outrageous and should not be considered.

JHP-13 Under the action alternatives, up to 1/3 of the 18,000 unroaded acres in the Honker Divide would become roaded (DEIS 4-215). Some logging roads would remain open to allow access to the waterway. Others would be closed, but unauthorized road access such as on ATVs will be possible (DEIS 4-225). The mitigation measure of closing some logging roads upon completion of harvest activities does nothing to deter illegal use of

Responses to Julie Hammonds Penn

JHP-10 Alternative 2 has been eliminated from detailed consideration in the SDEIS. Of the action alternatives being considered in detail, Alternative 11 does not include any road construction within 3 miles of the Elevenmile shoreline and Alternative 10 does not include any road construction within 5 miles.

JHP-11 Comment noted.

JHP-12 This comment refers to harvest activities associated with Alternatives 2 and 7 as presented in the DEIS. The SDEIS no longer includes these two alternatives.

JHP-13 Besides the section the comment refers to (Recreation, etc.), access management is addressed under the Transportation and Facilities and Wildlife sections in the DEIS and the SDEIS.

Comments of Julie Hammonds Penn

JHP-13 (cont.) these roads, a subject which the DEIS should treat in depth.

JHP-14 I believe that logging and road-building within the Honker Divide will severely reduce the value of this area for wilderness recreation. The Honker Divide is home to a rare inland population of Bald Eagles and to a healthy pack of Alexander Archipelago wolves. It boasts a canoe trail of great importance to local recreational guides and to canoeists across the West. Logging in the Honker Divide will cause unacceptable impacts on recreation and wildlife. For this reason, all action alternatives which include logging in the Honker Divide should be eliminated from consideration.

JHP-15 *4) The project will reduce the amount of roadless area available within the Project Area*

Roadless area, like old-growth forest, is only available once. On any time scale meaningful to our policy decisions, we only get one chance to decide whether an area will be roadless or not, old-growth or not. These decisions should not be made rashly or in haste. Roadless area should be jealously protected because of its great value for remote recreation and for wildlife species intolerant of roads (such as wolves).

The three large roadless areas in the Project Area would suffer various effects of logging (DEIS 3-213). Alternative 2 (the most logging-intensive alternative) would eliminate the Kogish Roadless Area, retain only a small amount of the Karta Roadless Area, and divide and reduce the Thorne River Roadless Area into two smaller pieces. (DEIS 4-222)

Over half of the Project Area, 109,474 acres, is designated Primitive and Semi-primitive Non-motorized, designations which offer non-motorized recreational opportunities. Between 36% and 75% of this area would be converted to roaded areas (Alt. 9 - 39673 acres lost; Alt. 2 - 82775 acres lost). All 11,720 acres around Lake Galea now designated Primitive would be converted (DEIS 4-208).

Alternative 10, not fully considered in the DEIS, should be reconsidered in a Supplemental EIS because it appears to greatly reduce the amount of roadless area that would be converted to roaded area.

JHP-16 Conclusion

In conclusion, let me use the DEIS' own words:

> **"Alternative 2 does not appear to be necessary and consistent with sound management of public lands due to the level of impact on subsistence use and wildlife habitat. Alternative 7 does not appear to be consistent because of the level of wildlife impacts in the Honker Divide Area." (DEIS 4-183)**

It is of utmost importance that the selected alternative be necessary and consistent with

Responses to Julie Hammonds Penn

JHP-14 The two alternatives with the greatest entry into the Honker Divide area, Alternatives 2 and 7, have been eliminated from detailed consideration in the SDEIS.

JHP-15 Comment noted. Alternative 2 has been eliminated from and Alternative 10 has been added to the detailed analysis in the SDEIS. Your statement that "over half of the project area, 109,474 acres, is designated Primitive and Semi-primitive..." is incorrect. These are inventory ratings and should not be confused with Forest Plan allocations that designate an ROS class as an objective.

JHP-16 Comment noted. Both Alternatives 2 and 7 have been eliminated from detailed consideration in the SDEIS.

Comments of Julie Hammonds Penn

JHP-16 (cont.)

sound management of public lands. It must also comply with the mandate of the law, which requires the Forest Service to manage the Tongass National Forest for a variety of uses, none of which may take precedence over the others. In advancing this timber sale under any of the proposed action alternatives, the Forest Service would be abdicating its responsibility to manage the forest for the benefit of all its users.

I believe that the Forest Service should reconsider its proposed timber sale in the Control Lake Project Area. The sale would cause significant harm to wildlife populations, subsistence hunters, and recreational users of the forest. The Forest Service should consider implementing Alternative 1, the No Project Alternative, in order to prevent these significant impacts. At the very least, the Forest Service should fully consider Alternative 10 in a Supplemental EIS. This alternative should be selected in preference to all other action alternatives, because it provides for a suitable level of timber harvest and protects all of the other values of the forest.

Very truly yours,

Julie Hammonds Penn

cc: Mr. Phil Janik, Regional Forester

enc

Responses to Julie Hammonds Penn

Comments of Julie Hammonds Penn

ERRORS NOTED IN CONTROL LAKE TIMBER SALE DRAFT ENVIRONMENTAL IMPACT STATEMENT

The following minor textual inaccuracies were noted during my reading of the Summary to the DEIS. Please note that these also apply to the DEIS, Volume 1:

JHP-17 | 1) (SUM p.2, final paragraph) Description of the proposed Rio Roberts Research Natural Area is contradictory. How can it allow natural processes to evolve without human influence for "development" purposes?

JHP-18 | 2) (SUM p.4, fourth paragraph) "additional timber from outside the KPC contract area is needed...". Is "contract area" the same as "Primary Sale Area" or does it include the Contingency Sale Area? Are sales to KPC from outside its contract area legal?

JHP-19 | 3) (SUM p.8, Issue 4) Public Law 104-19 expired on September 30th. What is the current status of this issue?

JHP-20 | 4) (SUM pp.15-16, Fig. S-3) The references in the key to Table x?x and Table 2-1 should be amended to read "Table S-1."

JHP-21 | 5) (SUM p.18 ff) "Resource Outputs" should be "Timber Outputs," since other resources are not discussed. "Economic Outputs" should be "Economic Outputs from Timber," since other economic benefits are not discussed.

JHP-22 | 6) (SUM p.22 second paragraph) The text refers to "all alternatives" when the apparent meaning is all action alternatives. Was the No Project Alternative fully considered, as the law requires?

JHP-23 | 7) (SUM p.22 Fig. S-4) contradicts the text. Which is correct?

JHP-24 | 8) (SUM p.24 Fig S-5) contradicts text describing the alternatives (for instance, on page S-19 the text states the Alt. 2 will require 218 miles of new road). Which is correct, the text or the figure? The table also ignores Alt. 1.

JHP-25 | 9) (SUM p.34, Item 4) The text explaining Alts. 8 and 9 is nonsensical. How can 90 acres of harvest take place where no units are harvested? Which is correct?

The following inaccuracies were noted in the DEIS, Volume 1:

JHP-26 | 10) (Ch.1 p.9) The Project Area consists of LUDs III and IV; 35,836 acres of LUD III, plus 136,075 acres of LUD IV equals 171,911 acres. But the Project Area as described on page 2 of Chapter 1 contains 201,371 acres. Please explain this discrepancy.

JHP-27 | 11) (Ch.2 p. 29) Issue 6 states that "PNV's are also negative for all action alternatives." Yet Figure 2-5 shows positive PNV's for all but Alt. 9. Which is correct? Will any of the alternatives return a net gain to the U.S. Treasury?

JHP-28 | 12) (Ch.4 p. 221) Table 4-99 shows Alt. 2 with 21,536 acres of roadless area, while the text refers to 30,700 acres. Which is correct?

JHP-29 | 13) (Ch.6 p.8) "Endemic" and "indigenous" are not synonyms.

Responses to Julie Hammonds Penn

JHP-17 The referenced wording has been modified in the SDEIS.

JHP-18 The term "contract area" includes the "contingency" areas. Tongass National Forest sales that contributed to the KPC volume commitments, were contractually legal under the KPC long-term contract. KPC was also allowed to bid on other National Forest timber sales.

JHP-19 Public Law 104-19 no longer applies and the TLMP Revision process along with this SDEIS, incorporate a system of old-growth reserves that will be managed as land use designations (LUD's).

JHP-20 These edits have been made in the SDEIS.

JHP-21 Appropriate changes have been made.

JHP-22 The text has been corrected. The No Action Alternative was fully considered in the DEIS and is fully considered in the SDEIS.

JHP-23 This contradiction has been corrected.

JHP-24 Their is no contradiction here. As discussed in the text, Figure S-5 refers to the harvest and road construction in old growth forest only. The title and legend of the figure have been modified to make this clearer.

JHP-25 The text has been corrected.

JHP-26 The project area includes National Forest system lands as well as

Comments of Julie Hammonds Penn

Responses to Julie Hammonds Penn

JHP-26 (cont.) state/private and encumbered lands. LUD's are not designated on these latter two categories, which total 29,460 acres in size. Thus, 171,911 acres plus 29,460 acres equals the project area acres of 201,371.

JHP-27 This discussion has been corrected and modified to reflect the alternatives now included in the SDEIS

JHP-28 The text has been corrected.

JHP-29 The definition of endemic has been edited.

Thank you for your thoughtful and comprehensive review.

Comments of David K. Person

David K. Person
P.O. Box 81605
Fairbanks, AK 99708

December 20, 1995

Forest Supervisor
Ketchikan Area
Tongass National Forest
Attn: Control Lake EIS
Federal Building
Ketchikan, AK 99901

Dear Sir:

Thank you for the opportunity to review the draft EIS for Control Lake. Having completed 3 years of research on the Alexander Archipelago wolf on Prince of Wales Island, I am very familiar with the project area. I have literally walked the length and breadth of about 80% of the sale area and have been through a large number of the planned units. Furthermore, I believe there is no one more qualified than I am to discuss the potential impacts of the proposed Control Lake timber sale on wolves.

Concerns Specific to Wolves

DKP-1 I have serious concerns about the proposed harvest alternatives that include units in the upper Logjam creek area. All of the units in the northern 2/3 of VCUs 577 and 574 are located within the center of activity of the Honker Divide wolf pack (Fig. 1). Indeed, unit 416 is within 40 meters of the pack's den (55° 48.443' N, 132° 53.682' W). This den is extensive and appears to have been used for several years. Interestingly, it was not noted by the consultants preparing the EIS even though major wolf trails (some 2-3 inches deep in the soil) lead through and around this unit.

DKP-2 Note that the majority of radio-locations are in habitat at low elevation along or near major drainages such as Logjam Creek, Hatchery Creek, Lake Galea, Thorne Lake, and the Snakey Lakes. Contrary to statements made in previous EIS's, wolves are not habitat generalists: *they select habitat where prey are available.* On Prince of Wales Island they are found in low-elevation old-growth patches in winter because deer concentrate in these stands, and

Responses to David K. Person

DKP-1 All of the alternatives in the SDEIS propose reduced levels of harvest and road-building in VCU's 574 and 577 relative to the proposed action defined in the DEIS. Units of concern in the Upper Logjam Creek area that were identified in your comment letter and confirmed in the May 3, 1996 letter to you from the Thorne Bay Ranger District are not proposed for harvest under Alternative 11 of the SDEIS.

DKP-2 Units in these areas of concern have been excluded from most of the alternatives in the SDEIS.

Comments of David K. Person

Figure 1. Radio-locations (•) and minimum convex polygon home range (-) for Honker Divide wolf pack, May 1993 - Oct 1995. Topography is represented by 1000-ft contour lines.

2

Responses to David K. Person

Comments of David K. Person

DKP-2 (cont.) they select timber-muskeg complexes in summer because both beaver and deer are available. Summer habitat is just as critical for wolves as winter habitat because home ranges are smaller during denning (Person and Ingle 1995), forcing wolves to obtain sufficient prey for the adults and pups within a smaller area. This is probably why they select habitat that provides multiple prey species. For example, 8 out of 11 active dens visited during our study were located near ponds with beaver colonies and both deer and beaver remains were found in scats collected at the dens. Four of the dens were near salmon spawning streams and the remains of fish carcasses as well as scats indicated consumption of fish by wolves.

DKP-3 It is stated in the DEIS that wolves use high-volume old growth in proportion to its availability (Person and Ingle 1995) and show preference for low-volume stands. In our report we lumped volume classes 4 and 5 under low-volume old growth and volume classes 6 and 7 under high-volume old growth. According to the TLMP planning team, the GIS timber inventory database cannot reliably discriminate between volume classes 5, 6, and 7. Consequently, those volume classes have been lumped into a single class called "highly productive forest". Reanalysis of our data shows that wolves select "highly productive forest" habitat, particularly in winter. Our reanalyis continues to suggest that wolves avoid second growth.

DKP-4 The core area for the Honker Divide pack is centered within the timber-muskeg complex west of Lake Galea and east of Logjam Creek and has remained a center of activity throughout the duration of our research. In contrast, neighboring packs occupying heavily logged landscapes (Twin Spurs and Ratz Harbor packs) have shifted activity (including denning activity) to different areas several times since we began our study. These shifts are probably related to human disturbance or changes in available prey density. In any case, the core-area fidelity of the Honker pack suggests at least short-term stability between predator and prey and the lack of invasive human disturbance. Furthermore, the Honker pack produced the largest litter of pups (6) of any pack this year for which data are available (Twin Spurs pack - 5 pups, Steelhead Creek pack - 1 pup, Kasaan pack - 3 pups, Kosciusko Island pack - 2 pups, Ratz Harbor pack - 3 pups).

Responses to David K. Person

DKP-3 The SDEIS text has been revised to reflect this point.

DKP-4 Units of concern in this area are largely excluded from harvest under the SDEIS alternatives, particularly in Alternatives 10 and 11.

Comments of David K. Person

DKP-4 (cont.)

These are important data because the Honker group is the only pack containing radio-collared wolves that has maintained stable numbers during the period of our research (Table 1). All of the other packs monitored have been reduced, primarily through hunting and trapping. Both the Steelhead Creek and Kasaan groups are new packs that have replaced wolves that were previously eliminated by trapping and hunting. They may represent sink groups that occupy heavily logged landscapes and are so vulnerable to human-caused mortality that their existence is temporary and turnover is high. Both packs denned in areas close to roads and human disturbance (they have very few alternative choices since most of their home ranges are logged), and the Kasaan pack female moved her den twice in 1995, probably in response to active logging on a slope immediately above the original den. Like their predecessors, these wolves will probably be eliminated by trapping. Indeed, the Kasaan alpha female was killed by hunters early in the 1995 deer hunting season. We are concerned that the Ratz Harbor and Twin Spurs packs may also become sink groups because of additional habitat loss and road-building resulting from the Central Prince of Wales timber sale. If this occurs, the importance of the Honker pack is magnified; wolf population viability within the northern portion of POW Island may depend on the existence of this pack as a source group capable of replenishing wolves that are periodically eliminated from adjacent roaded areas. The Honker pack is currently the most protected group on POW because it is exposed to a minimum number of roads and does not overlap any shoreline. The Control Lake timber project will seriously compromise this protection.

DKP-5

The Honker Divide pack is not the only group of concern. Timber units 420, 421, 422, 424, 431, and 433 in the VCU containing upper Steelhead Creek are within the core area of the Steelhead Creek pack. Road construction is planned within 200 meters of the 1995 den site (55° 37.109' N, 132° 53.355' W). The Steelhead Creek wolves occupy the lands around Big Salt Lake and Forest Service lands east to the Karta Wilderness (which is occupied by another pack). The only low-elevation unlogged and unroaded habitat left to these wolves are the lands at the end of the 2030 road system. These wolves are unlikely to persist because the pup disappeared and the alpha female was shot and killed in August 1995.

Responses to David K. Person

DKP-5

The proposed alternatives provide the decision maker various options to choose from, each with a different level of risk. Alternative 11 of the SDEIS includes many of these units of concern. Your information is incorporated into effects analysis of the SDEIS. The decision maker will make the final determination on how to best balance competing uses of National Forest System lands.

Comments of David K. Person

Table 1. Fall pack sizes[1] of wolf packs containing radio-collared individuals by year.

Pack	1992	1993	1994	1995
Honker	11	12	12	10-11
Twin Spurs	?	11-12	8	6
Ratz Harbor	?	7	7	5
Kosciusko	?	9-10	4	6
Kasaan	6	0	2	4
Steelhead	?	?	0	1
Thorne River	?	3-4	0	0

[1] Pack sizes are based on repeated direct observations.

DKP-6 Every recent EIS for timber sales on Prince of Wales states that wolves are habitat generalists, citing Paradiso and Nowak (1982). This reference is out of date, and a better statement would be: "The presence of wolves in an area is dictated by the availability of habitat for its prey species (Carbyn 1987) and the intensity of human-caused mortality (Mech et al. 1988, Mech 1995, Mladenoff et al. 1995)." The Control Lake timber sale places the wolf population of northern Prince of Wales at risk by continuing the process (begun by previous timber sales) whereby critical deer habitat is permanently lost and by exposing the most protected pack on the northern half of the island to human exploitation.

DKP-7 I suggest that all units in VCUs 574, 576, 577 be removed from the timber pool (exceptions can be made for units 416, 417, 418, and 423 in VCU 577). This will protect the Honker Pack and the deer and beaver resources that they require. It also eliminates all roading that will expose this pack to

Responses to David K. Person

DKP-6 Your comment is noted. The SDEIS text has been modified. Note also that the 1997 Forest Plan Revision designates substantial portions of the Control Lake project area for protection under the Old-Growth Habitat LUD. Additionally, we believe that the "permanent" loss of "critical" deer habitat associated with the Control Lake project is small.

DKP-7 Alternative 11 of the SDEIS has been designed to exclude all units in VCU's 574, 576, and 577 except the following: 576-423, 576-427, 577-416, 577-417, 577-418, and 577-423.

Comments of David K. Person

DKP-7 (cont.) excessive human-caused mortality. I want to re-emphasize that the timber units in VCUs 574, 576, and 577 could not be located in a worse area with respect to their impact on wolves.

DKP-8 Mitigation measures for wolves described in the EIS are ineffective. They are examples of micromanagement where broad revisions are required. Wolf timing near dens serves no real purpose and is nothing more than a public-relations gimmick. After the timing period, the area will still be cut, altering long-term deer density, and roads will still be built, allowing human access to the area. Elaborate and extensive dens such as the one used by the Honker Divide pack have been used for at least 3 years (based on our telemetry data) and the area around them should be preserved. Furthermore, dens should be monitored for activity as late as May 15 because den selection by wolves may occur as late as the first week in May.

DKP-9 Road closure policy implemented by the Forest Service has been inconsistent and largely ineffective in controlling human access. One of my study animals was shot in a trap (before I could process the animal) by someone driving down a road "closed" by signing. Even water-barred roads are accessible to ATVs. Analysis of wolf harvest data shows strong positive correlation between road density and wolf mortality (Kirchhoff et al. in review). As stated in the TLMP wolf conservation assessment (Kirchhoff et al. in review), the only effective road policy is not to build them in the first place.

DKP-10 The Control Lake DEIS states that wolf and deer habitat capability will decline 70% by 2054. Previous EISs for sales such as CPOW and Lab Bay indicate declines of 50-70% for most of the rest of northern POW Island. These reductions are unacceptable considering the Alexander Archipelago wolf is a U.S. Fish and Wildlife Service (USFWS) species of concern. Acceptance of these consequences certainly violates the spirit of the MOU concerning the conservation of wolves signed by the Forest Service, USFWS, and Alaska Dept. of Fish and Game (ADF&G). These are not cumulative issues beyond the scope of the project. At least four of the nine TLMP alternatives being considered in the new forest plan protect Honker Divide within an HCA, yet the Control Lake EIS targets most of the proposed HCA for timber harvest. It appears

Responses to David K. Person

DKP-8 We disagree with your statement that proposed mitigation measures for wolf are ineffective. The proposed measures are based on site-specific information and are designed to reduce the effects of timber harvest.

The 1997 TLMP Revision incorporates new standards and guidelines for protection of wolf. These measures will be applied to the Control Lake Project. The measures include maintenance of a 1,200-foot buffer of windfirm forested habitat around active wolf dens; road construction inside of this buffer would be discouraged.

DKP-9 Alternatives 10, 11, and 12 of the SDEIS reduce and/or eliminate road construction in the Project Area VCU's you listed as being of highest concern for wolves (VCU's 574, 576, and 577).

The 1997 TLMP Revision includes new standards and guidelines for protection of wolf. The Forest Service will work cooperatively with the Alaska Department of Fish and Game and U.S. Fish and Wildlife Service to maintain a long-term sustainable wolf population. In addition, the Forest Service will cooperate with Alaska Department of Fish and Game to monitor and manage annual wolf mortality. Both access management and seasons/bag limits will be considered to achieve management objectives of a sustainable wolf population.

DKP-10 The 1979 TLMP, which was in effect during most of the planning for the Control Lake project, identified lands in the Honker Divide area as available for harvest consideration. Alternatives that propose harvest in these areas, along with associated effects analyses, promote informed decision making in the NEPA process. Much of the Control Lake planning effort (e.g., landscape zoning, effects analyses, etc.) helped define LUD changes in the 1997 TLMP Revision.

Comments of David K. Person

DKP-10 | that the Ketchikan Area is working at cross purposes to the TLMP planning team, USFWS, and ADF&G.

DKP-11 | The habitat capability model for deer needs to be rerun because the model has been revised. In addition, I suggest the Forest Service adopt the stochastic modeling approach that I developed for the TLMP wolf conservation assessment (Kirchhoff et al. in review) to estimate the impact of the project on wolves. This model predicts deer:wolf ratios sufficient to maintain predator-prey equilibrium as well as a human harvest of deer.

DKP-12 | Based on our model predictions, a ratio of 180-190 deer:wolf would have a 90% probability of maintaining equilibrium between wolves and deer. The deer habitat capability for the project area is 9,718 deer, which would support approximately 50-55 wolves given a human harvest equivalent to about 20% of the annual recruitment to the deer population. The actual wolf density estimated from radio-telemetry data is 30-35 wolves per 1000 km^2 resulting in a fall population of 36-42 wolves within the project area. The actual wolf population is below the predicted density because the deer population is well below the deer HSI prediction (i.e., no evidence suggests that deer are near carrying capacity). In addition, wolves have been intensively trapped and hunted, reducing their numbers.

The HSI for deer in 2054 is 3058, which would support 16-17 wolves with a 90% probability of equilibrium. This represents a 70% decline in wolf numbers from 1995; in reality, however, it is likely to be worse. The equilibrium model is based on a deer population well below carrying capacity; consequently, the annual recruitment is predicted to be high. As second-growth stands >25 years old dominate forested portions of the project area, it is likely that intraspecific competition for food among deer will reduce reproductive rates. As a result, a higher ratio of deer:wolf will be required for equilibrium. If deer reproduction declines 50% (singlets instead of twins), the equilibrium ratio would increase to 360-380 deer:wolf. This would mean the HSI for deer in 2054 would support 8 wolves, a decline of 85% from 1995. At this low density of wolves and given the access to the area via roads, it is entirely possible that humans could cause the extirpation of wolves from the project area.

Responses to David K. Person

DKP-11 The 1997 TLMP Revision includes a revised deer model. This model has been addressed in the Control Lake effects analyses; the results are presented in the Wildlife and Subsistence sections of the SDEIS.

DKP-12 Note that conditions are substantially different under the new Forest Plan (1997). Note also that habitat capability models estimate habitat quality, but do not predict actual population levels. Populations are frequently above or below habitat model predictions at given points in time for a multitude of reasons including weather, and hunting and trapping pressure.

The results of the revised deer model show a general trend of decreasing habitat capability for deer. Numbers displayed for 2054 in the DEIS are an estimate of the conditions expected to after all old growth that is suitable under the new TLMP (1997) has been harvested. The SDEIS incorporates the most recent available information on management of Old-Growth Habitat areas under the 1997 TLMP Revision.

Comments of David K. Person

General Concerns

DKP-13

I examined all of the unit cards for VCUs from 574 to 595 and counted each unit in which moderate to high deer density or abundant wolf sign was indicated. Of the 78 units counted, only two units were deferred because of wildlife concerns, none of the units incorporated mitigation efforts that are of any value to deer or wolves, and none indicated immediate road closure after logging. Units were deferred primarily because of low timber volume or high MMI. I also noticed a great deal of variability in the quality of each assessment (in terms of the amount of detailed information presented), depending on who did the field exam. I have spent time with the consultants hired to do these surveys and have been to a large number of the units involved in the Control Lake project. In my opinion, the information concerning wildlife is hopelessly subjective and uninformative. It is my understanding that the Forest Service includes these stand examinations as part of your implementation monitoring, the idea being to use the data as a baseline for monitoring the effects of logging and mitigation efforts. The wildlife information in the units cards is not sufficiently reliable to use as a benchmark for monitoring purposes. Furthermore, the DEIS does not appear to incorporate any meaningful wildlife population monitoring at all.

DKP-14

In my opinion, the Control Lake project represents a tremendous gamble involving the most important undeveloped blocks of land on Prince of Wales Island. The Forest Service may choose to argue that this is an example of "adaptive management"; however, adaptive management is supposed to incorporate science. This project is analogous to a gambler betting his last dollar; one would hope that he would seek professional help before committing such egregious folly.

Sincerely,

David K. Person

David K. Person

8

Responses to David K. Person

DKP-13

All units suitable for harvest under current standards and guidelines are included in the revised unit pool, which is substantially smaller than the original unit pool. However, each alternative incorporates a different concern level for issues and resources, including wildlife. Alternatives 10 and 11 of the SDEIS respond to your concerns by reducing proposed harvest levels in VCU's 574, 576, and 577.

Appendix G of the DEIS presents the Road Design Cards for the project unit pool. The categories 'Maintenance Level' and 'Access Strategy' indicate the desired road maintenance plan and associated access strategy. Roads designated Maintenance Level 1 and Access Strategy Prohibit are intended to be closed immediately after completion of harvest activities.

Unit design and proposed mitigation is based on site-specific review of conditions within the unit, including walk-through evaluations of forage and habitat conditions, timber stand exam data, and GIS information on timber type, plant associations, site class, aspect, etc. The field inventory was not designed as, nor intended to provide, a baseline survey for monitoring efforts.

Monitoring of harvest and mitigation activities will occur under the Ketchikan Area Monitoring Plan, as described in Chapter 2 of the EIS.

DKP-14

The TLMP Monitoring Plan contains a specific question for monitoring the population trends of wolves. We disagree with your comment. The Control Lake EIS presents several alternative approaches to meeting the purpose and need and implementing the Forest Plan. The decision maker will use the analysis contained in the EIS to reach a balanced decision within the context of multiple-use and sustained yield management.

Literature Cited

Carbyn, L. N. 1987. Gray wolf and red wolf. Pages 358-376 in M. Novak, J. A. Baker, M. E. Obbard, and B. Malloch, eds. Wild Furbearer Management and Conservation in North America. Ontario Trappers Assoc., North Bay.

Kirchhoff, M. D., D. K. Person, V. Van Ballenberghe, C. Iverson, and E. Grossman. In review. The Alexander Archipelago wolf: A conservation assessment. USFS TLMP Planning Team Report. 34pp.

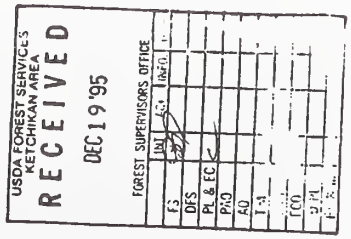
Mech, L. D., S. H. Fritts, G. Radde, and W. J. Paul. 1988. Wolf distribution in Minnesota relative to road density. Wildl. Soc. Bull. 16:85-88.

Mladenoff, D. J., T. A. Sickley, R. G. Haight, and A. P. Wydeven. 1995. A regional landscape analysis and prediction of favorable gray wolf habitat in the northern Great Lakes region. Conservation Biology 9(2):279-294.

Paradiso, J. L., and R. M. Nowak. 1982. Wolves. Pages 460-474 in J. A. Chapman and G. A. Feldhamer, eds. Wild Mammals of North America. Johns Hopkins University Press, Baltimore.

Person, D. K. and M. A. Ingle. 1995. Ecology of the Alexander Archipelago wolf and responses to habitat change. Prog. Rep. No. 3., On file, ADF&G, Douglas, AK. 39pp.

Comments of Jim Rehfeldt



Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan, AK 99901

Dear Mr. Powell:

JR-1 I am writing concerning the Control Lake timber sale draft Environmental Impact Statement recently released by the Forest Service. I feel that there are serious problems with the alternatives proposed, and that they need to be reconsidered.

JR-2 The amount of timber that is being (187 million board feet) is an unsustainable harvest yield that will seriously affect the wildlife and recreational value of this area for years to come. I feel that a smaller scale plan is a much better long-term plan for the Control Lake area.

JR-3 In particular, I feel that the Citizens Alternative (Alternative 10) offers the best compromise between clearcutting and maintaining the ecosystem of this area. As I have tried to iterate many times to your agency, **the future of the Tongass is not in the timber economy.** All over SE Alaska, people are looking for wildlife values, recreational opportunities, and tourism potential. This is a sustainable industry that can coexist with the vital fishing industry that already exists. It is important that Alternative 10 be reconsidered, as it reflects a new vision for the Tongass, and will work toward maintaining a healthy ecosystem that is economically more valuable than a quick clearcutting plan.

JR-4 This is not to say that the woods products industry is not vital to SE Alaska. High value wood products would be a proud addition to our economy. However, the present Forest service contract with Ketchikan Pulp is a huge deterrent to the establishment of a wood products industry that maximizes the economy produced from each tree cut. Until the Forest service begins management of the Tongass in this way, there will be opposition between the timber industry and the rest of the users, visitors and people of the Tongass. It is time for the Forest Service to begin the process of changing their management philosophy and the Control Lake Timber Sale is a great place to start.

JR-5 It is bad management that any of the Alternatives seeks to log in Honker Divide and Elevenmile Peninsula areas. The value of these areas is way beyond the timber that would be cut there. I urge you to remove these areas from the harvest areas of all the plans.

JR-6 Finally, I would like to see less clearcutting of old growth areas that support high quality ecosystems that nurture and protect bears, deer, wolves salmon, etc. It is important that biologists play important parts in all harvest plans to insure that the best scientific data is available for planners. Reports by the Viable Wildlife Population Committee, its Peer Review and the Anadromous Fish Habitat Assessment all recommend added protection of high quality ecosystems found in old growth water sheds. I support the findings of these reports and request their implementation into any harvest plans.

JR-7 In conclusion, please reconsider the Control lake timber sale. The Forest Service needs to change its management philosophy and start clearcutting less of the Tongass while gaining more economic gain from each tree cut. The present alternatives being considered are not acceptable and should be seriously revised.

J. Rehfeldt

Jim Rehfeldt
327 Highland Drive
Juneau, AK 99801

cc: Phil Janik, Regional Forester

Responses to Jim Rehfeldt

JR-1 Comment noted.

JR-2 Comment noted. The purpose and need has been substantially modified in the SDEIS.

JR-3 Comment noted. Alternative 10 is included in the SDEIS as an alternative being analyzed in detail.

JR-4 Comment noted. Please note that substantial changes have been made in the 1997 TLMP regarding future management of the Tongass.

JR-5 Comment noted. Please note that each of the action alternatives included in the SDEIS avoids the Honker Divide and Elevenmile areas from partly to completely.

JR-6 Comment noted. Please refer to response to GRB-4.

JR-7 Comment noted. Substantial changes have been made to the alternatives considered in detail in the SDEIS.

Comments of Jeffrey L. and Kathleen I. Roger

December 20, 1995

Jeff & Kathy Rodger
P.O Box 9588
Ketchikan, AK 99901

Brad Powell
Forest Supervisor
USDA Forest Service
Federal Building
Ketchikan, AK 99901

Dear Mr Powell:

My wife and I have lived in Southeast Alaska for a total of over 40 years. We fish, hunt, tour, and camp here. We own our home here. I work in the timber industry.
Kathy's father owned a logging company here from 1958 to 1974 and the areas he logged have grown back to the extent that it is difficult to tell that they were clear cut.
Where else in America can you do all these activities in one locality?

We are writing because we feel that our way of life is being taken away from us.
The timber industry provides us with the resources to hunt, fish, camp, tour, purchase consumable and long term items, make house payments and pay taxes here.

JLKR-1 While camping, hunting and fishing in the surrounding area, we have seen everything from fresh clear cuts to 100 year old, old growth forest. Wildlife, game and non-game, will and do find their niche in this cycle of growth. From fresh young sprouts to "ancient" semi-sterile forests. Timber harvest is not harmful to wildlife. In fact it provides more food and browse for both prey and predatory animals.

We suppport the maximum volume of timber from the Control Lake planning area as possible under the current forest plan. Also we do not want to see any more restrictions placed on the Honker Divide Area. There is already a one mile wide buffer zone on that system.
We believe that timber harvest, tourism and outdoor activities are compatible and beneficial to each other.

We do not need special timing restrictions for animals that are not actually threatened. Not those threatened in the minds of various special interest groups.
The special interest groups that are clamoring to destroy our way of life should not have their pet projects included in the E.I.S These people do not speak for us.
We would like to see the "Citizen's Plan" removed from the Appendix.

Sincerely

Jeffrey L. & Kathleen I Rodger

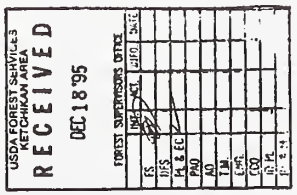
Responses to Jeffrey L. and Kathleen I. Roger

JLKR-1 Comment noted. The issue of local jobs and community stability is of major concern to the Forest Service. Also note that a new Forest Plan Revision has recently been adopted which incorporates a series of Old-Growth Habitat areas. The Control Lake project area includes a number of these reserves, including a large one around the Thorne River and Honker Divide. Also please refer to responses to DRS-2 and DM-3.

Comments of Teri A. Rosenthal

Dec 12, 1995

Bradley Powell
Forest Supervisor
Ketchikan Area
Federal Building
Ketchikan, Ak.
99901



Dear Mr. Powell;

I am a resident and business, on Prince of Wales. I do SUNRISER CRUISES in Summer and am working AS AN RN in Tucson this winter my Home is at Port St. Nicholas, Ilmi. I value highly multiple use of our Tongass Forest and "what" is left on Prince of Wales. I depend on tourism and Anadromous Fish runs for my livelihood. I am appalled to see only one side being considered. I am not against wood products but cuts from prime Habitat and watershed AREAS is criminal. We will have NO subsistence or anything of beauty to look at, would you want your home to be devoid of all habitat and ruined streams? Honker Divide is one of the highest quality watersheds in all of Southeast Alaska it's commercial Fish Production and sport Fishing values and also critical habitat are one of unsurpassed importance on P.O.W. Deer, bear, and wolves are important as this is prime habitat for them.

TAR-1

TAR-2

TAR-3

Would we wipe them out "totally" (wolves)

Responses to Teri A. Rosenthal

TAR-1 The effects analyses in the DEIS and in the SDEIS do not support this view.

TAR-2 Comment noted.

Comments of Teri A. Rosenthal

(2)

TAR-3 (cont.)

As they've done here in Arizona.

Will you the Forrest Service take on the Responsibility to implement the strategies recommended by Alaska Department of Fish and Game, and the Forrest Service "biologists", who advocate the establishment of habitat Reserves in Honker Divide and Elven nile

TAR-4

I support the citizens "Alternative 10" and want to see it both seriously considered in the Control Lake timber sale Environmental Impact Statement and a adopted as the selected Alternative in the Final decision.

I am adamant about the Forest service not logging in Honker Divide and Elven nile Peninsula.

TAR-5

We cannot put one need above all others the habitat we protect that is critical is for the animals, fish, us and generations unborn.

"Please" impliment the best scientific information and recommendations available, including the Viable Wildlife Population Committee Report and its Peer review and the Anadromous Fish Habitat Report (Assessment). The Reports Show that more needs to be done to safeguard Tongass Fish and wildlife from long-term impacts of clear cutting.

Sincerely, Please See Whats ontthere!

Teri Alexis Rosenthal

Responses to Teri A. Rosenthal

TAR-3 The 1997 Forest Plan Revision includes an extensive area of habitat reserves in the Control Lake project area (see large map accompanying this SDEIS) including reserves in and around Honker Divide and Elevenmile.

TAR-4 Comment noted. Alternative 10 is being given detailed consideration.

TAR-5 Comment noted. The Forest Service is trying to implement the best scientific information available. It is incorporated into the new Forest Plan Revision and the Control Lake SDEIS.

Comments of Bill Rotecki

907-225-5078 BILL ROTECKI 156 P01 DEC 26 '95 17:(

Bill Rotecki
Po Box 7738
Ketchikan, AK 99901
Dec 26, 1995

Bradley Powell
forest Supervisor
Tongass NFS
Ketchikan

Dear Mr Powell:

BR-1 Everyone talks about sustainable forestry, ecosystem management, economic diversification, community involvement protecting cultural resources and etc.

Here at last is a chance to exercise all of the plans, and more. Let us protect valuable fish habitat and also implement your own habitat protection strategy that will save you from endless EA lawsuits in the future. NOW is the time to implement the "new" policies we are always hearing about.

Please select alternative 10, endorsed by the locally owned forest products industry, and by the local communities —

Sincerely,

Bill Rotecki

Responses to Bill Rotecki

BR-1 Comment noted. Please note that Alternative 10 is now being considered in detail in the SDEIS.

Comments of Wallace Schwass

WS-1

Dec, 13, 1995

Dear Phil Janik;

Concerning Prince of Wales Island, I strongly support the Citizens' Alternative (Alternative 10) in re the timber sales. It should be seriously considered & adopted as the final decision selected alternative.

Elevenmile Peninsula & Honker Divide should not be logged.

More consideration to saving wildlife & real multiple use for the Tongass.

I am 78 & have visited Alaska often to see wildlife & scenery. Dr. Wallace Schwass P.O. Box 76, Richmond, Ill. 60071

Responses to Wallace Schwass

WS-1 Comment noted. Please note that Alternative 10 is now being considered in detail in the SDEIS. Also, all action alternatives avoid the Honker Divide and Elevenmile areas from partly to completely.

Comments of James W. Sears

December 21, 1995

James W. Sears
15230 N. Tongass
Ketchikan, Alaska 99901

Brad Powell
Forest Supervisor
USDA Forest Service - Ketchikan
Federal Building
Ketchikan, Alaska 99901

Subject: Control Lake Draft EIS Comment

Dear Sir:

I have lived in Southeast Alaska for 45 years. I hunt, fish, and work in the timber industry. I support multiple use management of all the Tongass National Forest. Much of the forest is already reserved for Wilderness and Parks, leaving some area for logging and other uses.

JWS-1 I support Alternative 2 of the draft which allows for harvest of about 233 mbf. This sale will have no long term adverse impacts on the environment. It will allow my employer, KPC, to continue to operate in a planned and sustainable manner. It will also result in more roads and access to even better recreational activities.

JWS-2 I am against the establishment of any Habitat Conservation Areas because they are simply a mechanism for creating Wilderness Areas without any public input or comment. I am for stream buffers and

JWS-3 other soil conservation measures. I support the 1 mile buffer around the Honker Divide Area, and further believe that the timber harvest that is planned will improve the ability of citizens to enjoy that area after the harvest is complete.

Sincerely,

James W. Sears

Responses to James W. Sears

JWS-1 Alternative 2 was dropped from detailed consideration in the SDEIS because it is strongly inconsistent with the new Forest Plan Revision (1997).

JWS-2 Comment noted. Note that a new Forest Plan Revision has recently been adopted which incorporates a series of Old-Growth Habitat areas. The Control Lake project area includes a number of these reserves, including a large one around the Thorne River and Honker Divide.

JWS-3 Comment noted.

Comments of Edwin L. Shay

December 19, 1995
P.O. Box 496
Langley, Wa. 98260

Dear Mr. Powell,

ES-1 I would urge you to please consider the Citizen's Alternative (Alternative 10) in the upcoming Control Lake timber sale E.I.S. favorably. Besides the intense impact on the fish spawning streams, I would ask you, please honor the efforts of the local community of natives and whites, of small timber operators and environmentalists. My greatest fear for this country is that when people who live in an area come together in an effort to sustain jobs and a future for their kids are simply ignored by their government, we have sown the eventual seeds of our own destruction. I know that as with so many issues, people can get shrill and irrational. I just believe that if citizens cannot see that their involvement in their own area problems is worth anything, the future for us as a society that must make compromises to survive, is in peril.

Thanks for your consideration.

Sincerely yours,

Edwin L. Shay

Responses to Edwin L. Shay

ES-1 Comment noted. Please note that Alternative 10 is now being considered in detail in the SDEIS.

Comments of Marty Sherman

Marty Sherman
3808 SW Huber Street
Portland, Oregon 97219

December 13, 1995

RECEIVED
DEC 18 1995
Forest Service
Juneau, Alaska
Timber Mgmt.

Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan, Alaska 99901

Dear Mr. Powell,

MS-1 I would like to urge you to NOT allow any logging in the Honker Divide or the Elevenmile Peninsula areas. These areas are too valuable for for wildlife purposes. The economic future of Southeast Alaska depends on protecting natural resources for its long term health. I don't know anyone from the Lower 48 who will travel to Alaska to see clear cuts and to fish muddy rivers.

Scientific information shows that fish and wildlife in Southeast need more protection. It is important that Honker Divide and Elevenmile Peninsula be left alone.

Sincerely,

Marty Sherman

Marty Sherman

c.c. Phil Janik

Responses to Marty Sherman

MS-1 Comment noted. Please note that each of the action alternatives avoids the Honker Divide and Elevenmile areas to varying degrees, ranging from partly to completely.

Comments of David R. Shipman

December 20, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska, 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I am a concerned citizen who lives Southeast Alaska. Thank you for including me in the planning process, I have some comments to make.

DRS-1 First, my family is directly supported by the forest products industry. I am in support of the maximum allowable timber harvest which meets the current Forest Service Standards and Guidelines in the Control Lake Planning Area.

DRS-2 Second, I do not believe that timber harvest is harmful to deer or other wildlife. In fact I believe it may help the deer by increasing the amount of browse in an area.

DRS-3 Third, I do not believe more restrictions should be placed on the Honker Divide Area. There is already a 1 mile wide buffer zone on the system. I think that timber harvest and tourism are compatible and are mutually beneficial.

DRS-4 Finally, I think timber sales should be economical. The Forest Service does not have to put up deficit timber sales.

Sincerely, David R. Shipman

P. O. Box 9388
KETCHIKAN, ALASKA. 99901
(907) 225-4663

DRS-5 P. S. Let US Loccal pepole make the Guidelines not pepole or GROUPS with dont live here. and Depend on this LAND for food, Livelyhood, and Recreation, we should know Best we live here and we are in the woods we see what it looked like before and what it looks like now. I also feel if you want to take an accurate count of Deer in an area The Best way is to count Deer not Deer Droppings, ask Hunters who have spent time in the woods and seen the Deer!

Responses to David R. Shipman

DRS-1 Comment noted.

DRS-2 Clearcuts do provide good browse for Sitka black-tailed deer, but only during their early successional stages. As clearcuts age to middle successional stages they provide little forage and are of less value to deer. Young clearcuts also provide forage only during snow-free months; when snow is present they are of low value. Clearcuts alone do not provide all the habitat elements required by deer. Sitka black-tailed deer use a variety of vegetational communities, including clearcuts. Old-growth forests provide the highest value because they provide snow cover and understory forage plants. The 1997 TLMP FEIS provides additional detail on the habitat requirements of Sitka black-tailed deer.

DRS-3 Comment noted. However, the 1997 Forest Plan has placed more restrictive land use designations around the Honker Divide area primarily for the maintenance of viable, well-distributed wildlife populations in the north half of Prince of Wales Island.

DRS-4 Comment noted.

DRS-5 The Control Lake EIS uses habitat capability models developed by interagency task groups to estimate the capability of the study area to support deer. The model results do not reflect actual populations, but provide a method for identifying habitat values and limiting factors. The pellet-group count has been substantiated as an acceptable method of estimating populations of deer by wildlife management agencies across the country, and is used when site-specific population estimates are needed. It is particularly valuable in areas where ground cover and canopy cover are sufficiently dense to make census methods, based on deer visibility, subject to differential biases associated with variations in cover types and observer. This is the case in Southeast Alaska.

Comments of Jim Shoemaker

December 23, 1995

Mr. Brad Powel
Forest Supervisor
USDA Forest Service - Ketchikan
Federal Building
Ketchikan, Alaska 99901

RE: CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powel,

JS-1 At this time I would like to urge the Forest Service to adopt Alternative # 2 for the Control Lake Planning Area. This timber sale has already met all guidelines and standards as put forth by the Forest Service and should be allowed to proceed.

Continued supplies of timber are vital to maintaining a healthy logging industry - and a healthy logging industry is vital to the overall economic health of Southeast Alaska. In viewing the Prince of Wales area in particular, the timber industry has been integral in the growth of the island and has enhanced the recreation opportunities through better road access.

JS-2 Habitat Conservation Areas, timing restrictions and comments by special interest groups do not reflect the wishes of all concerned citizens. For that reason, I feel that the "Citizen's Plan" should be removed from the Appendix. If it is left in, the EIS will become too cumbersome.

Sincerely,

Jim Shoemaker
3723 El Camino
Juneau AK 99801-8845

Responses to Jim Shoemaker

JS-1 Alternative 2 was dropped from detailed consideration in the SDEIS because it is strongly inconsistent with the new Forest Plan Revision (1997).

JS-2 Comment noted. However, Alternative 10 is consistent with the revised purpose and need. Therefore, it is included in the main text of the SDEIS.

Comments of John Sisk

DEC-12-95 TUE 00:58 JOHN SISK 907 586 2544 P.01

1 of 4

Bradley Powell
Forest Supervisor, Ktn. Area
Federal Building
Ketchikan, AK 99901
Fax: 907-228-6215

December 12, 1995

Dear Mr. Powell:

Please send me a copy of the summary + maps for the Control Lake DEIS, & please include this letter in the record of public comment on the Control Lake Timber Sale.

JS2-1 I understand how limited your choices are, so long as the KPC contract and its timber volume requirements drive management of the south Tongass. Yet it is abundantly clear that there is local and regional support for new approaches to logging + wood product manufacture on Prince of Wales Island. Craig, Klawock and Hydaburg apparently support Alternative 10, the "Control Lake Citizens

Responses to John Sisk

JS2-1 Comment noted. Please note that Alternative 10 is analyzed in detail in the SDEIS, that each of the action alternatives avoids the Honker Divide and Elevenmile areas to varying degrees, and that the Control Lake project will no longer provide timber to KPC under the long-term contract (all timber will go to the independent sale program).

Comments of John Sisk

JS2-1 (cont.)

DEC-12-95 TUE 00:58 JOHN SISK 907 586 2544 P.02

2 of 4

Alternative." This sends an important message to the Forest Service, to Washington, D.C. and to all of us. There is an important role for timber on the Tongass, but the public is ready for a change toward independent sales, sustainable harvest levels, and greater local say-so in how timber harvest is balanced with other concerns. Unfortunately it is not possible to have this new type of timber program "on top of" the KPC contract volume. There is the conflict. It's a shame the Forest Service doesn't lay this out more clearly for the public — or perhaps you do, hence my request for a copy of the summary.

In addition, I've thought for some time that the Forest Service could re-gain a lot of public trust and increase folks' acceptance of your tough choices by

Responses to John Sisk

Comments of John Sisk

Responses to John Sisk

JS2-1 (cont.)

DEC-12-95 TUE 00:59 JOHN SISK 907 586 2544 P.03

3 of 4

protecting some key areas that P.O.W. & Ketchikan residents have been concerned about for decades:

(*) Honker Divide;

(*) Cleveland Peninsula.

In addition, the ill-fated "FHIP" EIS of about 1985 showed the F.S. how strong local support is for protecting subsistence uses on the peninsula north of Craig.

Overall, I think going into Honker is a big mistake the F.S. will regret later. It just shouldn't be that hard to protect the central corridor, manage the outer corridor for wildlife w/ limited timber, & still get some wood out of the sale. By doing so you'd win a lot of public support; by not doing this you're ensuring a bigger conflict... or a continuation of big conflicts.

Comments of John Sisk

Responses to John Sisk

DEC-12-95 TUE 00:59 JOHN SISK 907 586 2544 P.04

4 of 4

Thanks very much for your consideration. Good luck with your final decision.

Sincerely,

John Sisk

John Sisk
P.O. Box 21664
Juneau, AK 99802

cc: Phil Janik
Regional Forester
fax: 586-7840

JS2-1 (cont.)

☆ **P.S.** Honker Divide should become POW's top-notch, blue-ribbon recreation area! Fishing, hiking, canoeing, camping & wildlife observation, hunting and an "old growth showcase." The economic value of this approach is great -- it could be a marketing magnet for P.O.W. tourism. And, you (the F.S.) can do this as part of a POW Island mgt. approach that is truly "economic diversity & balanced multiple use." Don't miss this opportunity!

Comments of Marcy C. Smith

Dear Brad Powell,

I urgently request you choose Citizens' alternative no 10. Do not log Honker Divide. Resources should benefit all, including wildlife. not just the timber industry

Warm wishes for all the season's best!

Sincerely,

Mary C. Smith

Thank you for your attention
I have lived in Alaska
since 1946

Responses to Marcy C. Smith

MCS-1 Comment noted. Alternative 10 is under active consideration.

MCS-2 Comment noted. All alternatives in the SDEIS avoid Honker Divide from partially to completely.

Comments of Pete Smith

Pete Smith
PO Box WWP Whale Pass
Ketchikan, AK 99950

December 25 1995

Brad Powell
Forest Supervisor, Ktn. Area
Federal Building
Ketchikan, AK 99901

Dear Mr. Powell

Please accept these as my comments on the Control Lake DEIS.

PS-1 I have worked, played and lived a subsistence life on Prince of Wales Island for the past 12 years. My wife and I have begun the process of raising two children here in that time. Now, more than ever, it is brought home to me that our island that we call home is in jeopardy. Without ample supplies of oldgrowth timber, our future, and that of our children, is threatened. I am a logger, I need trees to make a living with. At the same time I live a life close to the earth, I need deer and fish to eat and big timber to recreate in. There needs to be a balance between logging and wildlife protection. This plan is not it. This is still the same old story with corporate timber interests first and foremost.

PS-2 The stated purpose and need for this project is in error. The Control Lake sale area is outside of the long term contract primary sale area. There is no basis for your 187 mmbf figure. The Forest Service often uses the argument that their hands are tied because of contractual obligations. However, the Forest Service is only obligated to offer enough timber to run the KPC mill at a 525 ton per day capacity, which translates to 154 mmbf annually. This volume could come from the APC offering area now that the Sitka mill is no longer operating. There is no valid reason to continue destroying the majority of the Prince of Wales Island oldgrowth forest, which also destroys our future livelihoods.

PS-3 Honker Divide holds some of the most valuable wilderness land left in SE Alaska. From a monetary standpoint alone, this area is much more valuable left standing to attract future generations of the American populace (whose forest this really is!) for a true wilderness experience. This area also is a critical, large block of high value wildlife habitat. Areas such as this are necessary as wildlife recharge areas to repopulate other depleted areas on the island. It

PS-4 is necessary for the Forest Service to implement the best scientific information and recommendations available, including the Viable Populations Committee Report and its Peer Review and the Anadromous Fish Habitat Assessment. These reports show that more needs to be done to safeguard Tongass fish and wildlife from the long term impacts of clearcutting. As TTRA mandates, this is a multiple use forest and as such, large blocks of high value timber must be left standing to preserve wildlife populations for subsistence and sport hunting, tourism and recreation.

PS-5 This area would best be served by providing wood to independent operators, as shown in Alternative 10 or the Citizens Alternative. This is the only alternative that makes any sense for the residents of this island. It is past time that the Forest Service started managing the timber resource for the people instead of corporate interests.

Sincerely

Responses to Pete Smith

PS-1 Comment noted.

PS-2 The purpose and need for the project has been changed to reflect KPC's closure of its pulp mill and the modification of the KPC long-term contract.

PS-3 Comment noted.

PS-4 Comment noted.

PS-5 Comment noted.

Comments of Shelley Stallings

Mr. Shelley Stallings
618 Sunset Drive
Ketchikan, Alaska 99901

December 24, 1995

Forest Supervisor / Ketchikan

SS-1 | **Alternative 10** is the only alternative which meets the long term needs of the people of the area. Alternative 10 is the only one which comes close to balancing the needs of the people and the needs of the other life forms which depend on the land.

SS-2 | With the exception of the "no action" alternative, all the other alternatives are not sustainable. These different versions of intensive extraction of trees only serve the short term profit of a large corporation whose stockholders do not live in Alaska, much less in the area where the industrial scale logging would take place. These people have no stake in the long term health of the land. Next quarters profits are the goal, not the viability of a region to sustain generations of people who choose to live on or near Prince of Wales Island.

Alternative 10 was developed by and for the people who live in the region, people who hope to live there for many years if not decades. **Alternative 10** of all of the alternatives best balances the protection of all of the resources; soil, water, wildlife and flora with the needs of the people to make a living from the land at a scale which can be sustained for generations.

Alternative 10 is the only alternative which will actually provide a positive income to the USFS, instead of continuing the practice of deficit timber sales in the Tongass National Forest. In these days of budget cutting this is an important consideration.

Alternative 10 protects important subsistence areas for the people who live in the region. **Alternative 10** protects the irreplaceable Honker Divide area for the abundance of wildlife which lives there.

Alternative 10 is supported by scientists who best understand the relationships between the land and the animals who depend on the land for their very existence. This includes the animal who will decide what is the best stewardship of this land. An intelligent decision is critical. The USFS needs the credibility that this decision would give it. The USFS should choose **Alternative 10** for the Control Lake Timber Sale.

Signed,

Mr. Shelley Stallings

Responses to Shelley Stallings

SS-1 Comment noted. Please note that Alternative 10 is considered in detail in the SDEIS.

SS-2 Comment noted. Please note that the range of alternatives included in the SDEIS is now quite broad, extending from 38 to 113 MMBF in terms of timber volume. Also, note that each of the action alternatives avoids the Honker Divide and Elevenmile areas to varying degrees and that the Control Lake project will no longer provide timber under the long-term contract.

Comments of G.P. Streveler

Dec. 26, 1995

Bradley Powell
Phil Janik
U.S. Forest Service
Federal Building
Ketchikan, AK 99901

Dear Sirs:

I am writing to comment on the DEIS for Control Lake.

GPS-1 Though many comments would be appropriate, I will restrict my emphasis to two matters of particular concern:
- It is unethical and incorrect for the country to basically ignore the citizen's alternative (#10). This is the sustainable alternative, the economically sound alternative, the alternative built by the public. At the very least, it deserves a full analysis!

GPS-2 - Keep logging out of Honker Divide. Any large block of old-growth remaining in POW is too valuable for maintaining ecological and wilderness quality to be logged at all.

Thank you for this opportunity to comment.

Sincerely,

G.P. Streveler
Box 94
Gustavus, AK 99826

Responses to G.P. Streveler

GPS-1 Comment noted. Please note that Alternative 10 is considered in detail in the SDEIS.

GPS-2 Comment noted. Please note that all action alternatives avoid the Honker Divide area from partly to completely.

Comments of Kathy Streveler

Dear Bradley Powell and Phil Janik,

KS-1 I feel very strongly about the over harvesting of the Tongass. The Tongass has not been managed with all of its users equally considered. I ~~would like~~ feel strongly that you support the Citizens Alternative (10) for the Control Lake sale. The citizens put many hours and thought into this alternative and it is well thought through

KS-2 I also want to take this chance to state that I am strongly opposed to logging in the Honker Divide area. It is heavily overlogged and the Divide offers some needed unlogged watershed area for wildlife and other users of the forest

Thank you for your consideration,

Kathy Streveler

Kathy Streveler
Box 155
Gustavus AK 99826

Responses to Kathy Streveler

KS-1 Comment noted. Please note that Alternative 10 is considered in detail in the SDEIS and that a new TLMP (1997) has been adopted which has a substantially lower allowable annual cut.

KS-2 Comment noted. Please note that all action alternatives avoid the Honker Divide area from partly to completely.

Comments of John R. Swanson

John R. Swanson
3400 Edmund Blvd.
Minneapolis, MN 55406

18 December 1995.

Regional National Forest
Federal Building
Petersburg, Alaska 99901.

Gentlemen;

JRS-1 Please accept my following comments concerning the Central Lake Simpson Draft Environmental Impact Statement.

Logging and Roading in this Central Lake area will destroy soil, water, fish, wildlife, plant, visual, and Road less - Wilderness resources.

May I suggest that this Central Lake area be dedicated as a Preserve, and with No development activities.

Because this area was a Sanctuary for plants, wildlife, and fish.

And a Fish, Wildlife, Plant Habitat Preserve.

And to fully protect all riparian, wet lands, and stream areas with all old-growth including any National Old Growth Preservation System.

To designate the Rowan River, and Hatchinery creek, as National Wild Rivers.

And to designate each of the following areas, with changes, as Wilderness:

Bogoslof 93,000,

Kanta 64,000 / and add to current Kanta Wilderness, and

Shoemaker Bay 92,000.

To select alternative Preservation; to manage this area as a Preserve/Sanctuary, and with No development.

Do what fully benefit Man, and all life!

Sincerely,

John R. Swanson

Responses to John R. Swanson

JRS-1 Comment noted. Please note that the range of action alternatives in the SDEIS is very broad, ranging from 38 to 113 MMBF. Also note that the Honker Divide and Elevenmile areas are avoided from partly to completely by each of the action alternatives. Further, the 1997 TLMP Revison incorporates a wildlife habitat conservation strategy for maintaining viable, well-distributed populations of wildlife species on the Tongass.

Comments of Frank Talerico

FT-1

mr. fowell, Forest Supervisor

I have been working and paying taxes in this county for the past 25yrs. The last 10 in the Timber industry (KPC). nearly ½ of the timber jobs have Disappeared. replaced by Tourist Jobs which pay less than enough per hour to make a living in Ketchikan. The Tourist industry & the extreme environmentalists have 95% of the Forests. we Timber people have 10% or less available to us. I think this is more than fair to those groups of NON-Producers. Parasites on Society. I you or they Succeed in shuting our industry Down and I lose my Job, I Guarantee I will never pay another cent in taxes to this country. Never!!! you can pass that on to your Draft Dodging Boss Bill Clinton, who I voted for because he said People would come first, LIAR! I now never voted Republican but I will be in '96. you extremist and Bil Clinton can kiss my Italian Butt and vote Good-bye

Frank Talerico
KPC - Lab

Responses to Frank Talerico

FT-1 Comment noted.

Comments of Roy Tanino

12/21/95

BRAD POWELL
FOREST SUPERVISOR
USDA FOREST SERVICE-KTN
FEDERAL BUILDING
KETCHIKAN, ALASKA 99901

CONTROL LAKE DRAFT EIS COMMENTS

MR. BRAD POWELL,

RT-1 PLEASE CONSIDER THIS LETTER AS A "YES" FOR UTILIZING THIS RENEWABLE RESOURCE. I AM A FIRM BELIEVER IN UTILIZING RENEWABLE RESOURCES TO THE FULLEST.

FOR ALL THE REASONS THAT HAVE BEEN MENTIONED BY THE MANY LETTERS YOU HAVE RECEIVED, I TOO AM FOR-IF IT IS FOR THE USE OF THE TONGASS TIMBER.

AS YOU PROBABLY GUESSED, I AM EMPLOYED BY THE TIMBER INDUSTRY, AND I AM VERY MUCH FOR UTILIZING THE TONGASS AS LONG AS WE ENSURE THAT THE RESOURCES ARE RENEWED.

SINCERELY,

ROY TANINO

Responses to Roy Tanino

RT-1 Comment noted.

Comments of Charlotte Tanner

Sticks & Stones
[redacted]
PO 886
Ward Cove, Alaska 99928
907-247-3685
Fax e-mail KSCT@acad1 alaska edu

December 20, 1995

Bradley Powell
Supervisor
Federal Bldg.
Ketchikan, Ak. 99901

Dear Mr. Powell:

CT-1 | Do not log Honker Divide or Elevenmile Peninsula. Have some mercy in this Christmas Season.

Thank you,

Charlotte Tanner

Responses to Charlotte Tanner

CT-1 Comment noted. Please note that each of the action alternatives in the SDEIS avoids the Honker Divide and the Elevenmile areas from partly to completely.

Comments of Judy Thompson

JUDY THOMPSON
5508 FLAGLER STREET
METAIRIE, LA 70003

November 18, 1995

Forest Supervisor
Ketchikan Area
Tongass Nat'l. Forest
Attn: Control Lake EIS
Federal Bldg.
Ketchikan, AK 99901

Dear Sir or Madam:

I have reviewed the EIS for the Control Lake Project Area.

JT-1 I am in favor of Alternative 10 for several reasons. It was developed by local people, including residents and independent timber contractors. This alternative will result in less timber cut and will have a positive cash flow. It will also result in less roads being built & am especially impressed because it identifies the most important areas to the local residents.

Please seriously consider Alternative 10

Sincerely
Judy Thompson

Responses to Judy Thompson

JT-1 Comment noted. Please note that Alternative 10 is analyzed in detail in the SDEIS.

Comments of Dalton Toy

Dear Mr. Powell,

DT-1 I am writing in regard to the E.I.S. for control lake. I am afraid that too much of our timber reasource is being tied up for reasons other than sound management practices. I encourage the Forest Service to release the maximum amount of timber possible.

Sincerely

Dalton Toy

Responses to Dalton Toy

DT-1 Comment noted.

Comments of Mike Van Note

Dear Mr Powell

MVN-1 I hope that you will seriously reconsider plans to log in the Honker Divide on Prince of Wales Island. Surely there are more appropriate places to cut timber than one of the classic canoe routes & premier fish & wildlife areas of S.E. Alaska. There are some places that should simply be left alone, and this is one of them!

Sincerely,

M. Le Van Note
Box 26
Haines, AK
99827

USDA FOREST SERVICES
KETCHIKAN AREA
RECEIVED
JAN 8 '96
FOREST SUPERVISORS OFFICE

	INT.	ACT.	INIT.	DATE
FS	BV			
DFS				
PL & EC				
PAO				
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Responses to Mike Van Note

MVN-1 Comment noted. Please note that only alternatives which partly or completely avoid logging in the Honker Divide area are being actively considered in the SDEIS.

Comments of Comments of Susan E. Walsh

SW-1

Mr. Powell,

I would like to comment on the Control Lake DEIS.

I can not support any of the "action alternatives" considered in the DEIS, other than the no action alternative, I wholeheartedly support the Honker Divide / Elevenmile citizens alternative.

I attended the workshop held recently in Ketchikan regarding this issue and reiterated the position of the Ketchikan Chamber of Commerce in opposing to Mr. Archie, the need [illegible] KPC to have it's 87mmbf met, without I might add, any regard to the citizens whose lives and backyards are directly affected.

You must also realize that Mr. Ballard, also works for KPC on a contractual basis, this also tends to muddy the waters when attempting to present a clear vision.

May the seasons of your life be filled with peace and love.

Yours is not an enviable task as what you would take into account the diversity of interests that our forest supports.

Thank you for your consideration

Sincerely,

Susan E. Walsh

Responses to Comments of Susan E. Walsh

SW-1 Comment noted. Please note that Alternative 10 is analyzed in detail in the SDEIS, that each of the action alternatives avoids the Honker Divide and Elevenmile areas to varying degrees, and that the Control Lake project will no longer provide timber to KPC under the long-term contract (all timber will go to the independent sale program).

Comments of John Warth

11015 39th Ave NE
Seattle, WA 98125
Dec 11, 1995

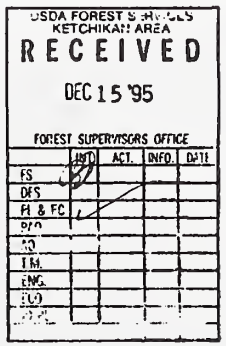
Bradley Powell
Forest Supervisor, Ketchikan Are

Dear Sir:

JW-1 I support the Citizens Alternative #10 on the Control Lake Project. I do appreciate the tremendous amount of work done for the Draft EIS, but feel all alternatives are balanced too far towards timber production.

Saving entire watersheds (or watever exists today), is extremely important. They provide control areas, as well as the experience of total wilderness (not just pretty areas).

Sincerely,
John Warth



Responses to John Warth

JW-1 Comment noted. Please note that Alternative 10 is considered in detail in the SDEIS.

Comments of Nancy Waterman

Box 20993
Juneau, AK 99802
December 19, 1995

Bradley Powell
Forest Supervisor, Ketchikan Area
Federal Building
Ketchikan, AK 99901

Dear Mr. Powell:

NW-1 | Please consider the Citizens' Alternative (Alternative 10) in the Control Lake timber sale Environmental Impact Statement. Adopt it as the selected alternative in your final decision.

Sincerely,

Nancy Waterman

Responses to Nancy Waterman

NW-1 Comment noted. Please note that Alternative 10 is considered in detail in the SDEIS.

Comments of Sandra White

December 21, 1995

Mr. Brad Powell
Forest Superviser
USDA Forest Service - KTN
Federal Building
Ketchikan, Alaska 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

I have lived and worked here in Southeast for several years. My family and I enjoy the beauty of Southeast and love to camp, hunt, fish, and hike in the area. Being employed by KPC, we are dependant on the timber industry for our living. I am a strong believer in conservation and sound multiple use forest management practices. However, I do not agree with the conservation groups agenda to eliminate logging on the Tongass.

SW2-1 | I support Alternative 2, which harvests 233 million board feet of timber. I do not believe Habitat Conservation Areas should be
SW2-2 | implemented. I believe there are enough areas that can never be logged to provide for the preservation of plant and wildlife concerns. I do support stream buffer strips and the Honker Divide
SW2-3 | Area buffer zone that is already in place, but do not support further restrictions.

SW2-4 | I also believe that timber harvest is beneficial to wildlife, in that it opens up new forage areas. Is it not true that studies have been done to prove that clear-cutting actually increases deer populations? If the Tongass is on a 100 year rotation then there should always be sufficient old growth, 2nd growth, and clearcuts to sustain a viable population of most any specie.

SW2-5 | I believe logging provides the road system to open more of the forest to public use for all groups.

Thank you for considering my concerns in your Tongass management efforts.

Sincerely,

Sandra White
12398 Cloudberry
Ketchikan, AK 99901

Responses to Sandra White

SW2-1 Comment noted. Alternative 2 has been eliminated from detailed consideration in the SDEIS because it is so inconsistent with the 1997 Forest Plan Revision.

SW2-2 Comment noted. The implementation of Old-Growth Habitat Areas has been adopted by the new Forest Plan (1997) and will be implemented on the Control Lake project.

SW2-3 Comment noted.

SW2-4 Refer to response to DRS-2.

SW2-5 Comment noted. Development of new road systems is considered positive by some groups and negative by others.

Comments of David Wieler

lgbk95\dec\control
BRADLEY POWELL 12-19-95
FOREST SUPERVISOR
USFS
FED. BLDG.
KETCHIKAN, AK 99901 control lake

SIR:

DW-1 This is a letter in support of the Citizen's Alternative.

DW-2 There was an apparent shortage of timber for KPC and Seaborne this fall. Aged logs did appear in raft after raft in Ward Cove as the season went on - where did they come from? Were they all from British Colombia or were some of them cold decked around SE AK?

I understand that KPC will sell bundles of sawlog seconds for about 700 to local processors. How does this compare with USFS stumpage?

DW-3 At the D2 hearings, some of us were under the impression that certain areas were to be left alone. Sarkar, Honker Divide, were some names that came up then. It was my impression that these very special areas were to be left off the table when tradeoffs were to be contemplated. Since then a lot of things have happened. Endangered species. HCA's. The closing of the Sitka pulpmill and abridgement of contract. Litigation.

DW-4 Instead of taking prime habitat, old growth riparian, and similar stands, can we not consider higher elevation timber that has been withdrawn for visual considerations? This would, in my simple minded opinion, cause less damage to wild life and subsistence harvest.

Respectfully,

David Wieler

Box 611
Ward Cove

Responses to David Wieler

DW-1 Comment noted. Please note that Alternative 10 is considered in detail in the SDEIS.

DW-2 The Control Lake project will no longer provide timber to KPC under the long-term contract.

DW-3 Things have continued to change since this comment was written. A new Forest Plan (1997) has been adopted and the KPC pulp mill has shut down. Also, note that each of the action alternatives included in the SDEIS avoids the Honker Divide and Elevenmile areas to varying degrees.

DW-4 Please refer to response to DW-3 and note that the new action alternatives range from 38 to 12_ MMBF in terms of timber volume. The timber included represents both higher elevation timber and low elevation stands.

Comments of Bob Wilson

USDA FOREST SERVICE
KETCHIKAN AREA
RECEIVED
DEC 19 '95
FOREST SUPERVISORS OFFICE
INIT ACT INFO
FS
DFS
PL & FC
PAO
AO
TM
ENG
PL

Bob Wilson
509 Douglass Ave
Richland, WA 99352

December 15, 1995

Bradley Powell, Forest Supervisor
Federal Bldg
Ketchikan, AK 99901

RE: Control Lake Timber Sale Draft Environmental Impact Statement

Mr. Powell,

BW-1 As a former Alaskan resident and forest technician on the Tongass National Forest, I am appalled that the local citizens alternative, Alternative 10, to the draft environmental impact statement (DEIS) concerning the control lake timber sale has not been adequately considered. Alternative 10 provides for resource extraction at sustainable rates while protecting the invaluable fisheries, wildlife, cultural, and recreational resources of the area.

BW-2 I traveled extensively throughout Prince of Wales Island while working with the Forest Service in support of surveying activities in the 1980's and intend to return to Southeast Alaska soon. The areas impacted by the Control Lake Timber Sale are extremely important critical wildlife habitat and fisheries areas that must be protected from adverse effects of logging. Particularly sensitive is the Honker Divide area and the Elevenmile Peninsula. These areas must NOT be logged.

BW-3 Unfortunately it appears that the U S Forest Service is bowing to demands from Ketchikan Pulp at the expense of the long term ecological health of the area and has ignored the local citizens repeated appeals to protect sensitive areas from logging. This is evidenced by the Control Lake DEIS's failure to even mention the Forest Service's own "Anadromous Fish Habitat Assessment."

BW-4 The Tongass, though heavily and adversely impacted in areas from excessive logging, still has a number of ecologically and culturally important areas intact such as Honker Divide and Elevenmile Peninsula. These must be preserved for the future, not cashed in for short term profiteering by a privileged few.

If we, as a nation, have learned anything from the crisis that other northwest national forests have landed in from years of excessive resource extraction it is that in the Tongass we have a chance to NOT repeat the mistakes of the past. On the Tongass, we can look to the future, having learned from the past that one of the products from excessive resource extraction is a degraded environment for all citizens, local and national.

BW-5 Unfortunately, the Control Lake Timber Sale DEIS is a prescription for continuation of commodities production at the expense of all other forest resources.

I urge you to reconsider the balanced measures in citizen's alternative to the Control Lake DEIS, Alternative 10, and select this alternative as the preferred alternative in the Control Lake Timber Sale.

Sincerely,
Bob Wilson

cc: Phil Janik, Regional Forester
Jack Ward Thomas, Chief USFS
Southeast Alaska Conservation Council
U S Rep. Don Young
U S Senators Stevens & Murkowski

Responses to Bob Wilson

BW-1 Comment noted. Please note that Alternative 10 is considered in detail in the SDEIS.

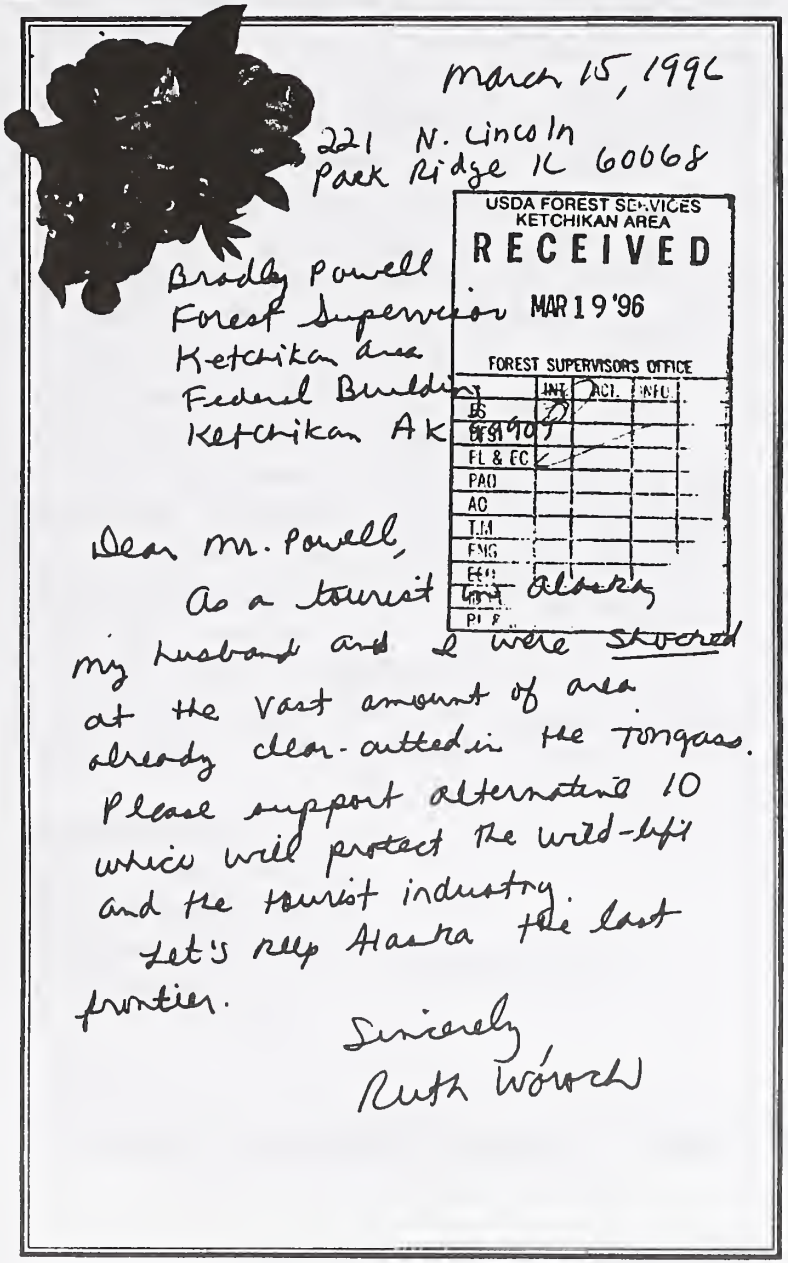
BW-2 Comment noted. Please note that each of the action alternatives included in the SDEIS avoids the Honker Divide and Elevenmile areas to varying degrees, ranging from partly to completely.

BW-3 None of the Control Lake timber will be provided to KPC under the long-term contract. Also refer to response to SEAC-26.

BW-4 Refer to response to BW-2.

BW-5 Comment noted.

Comments of Ruth Worock



March 15, 1996

221 N. Lincoln
Park Ridge IL 60068

USDA FOREST SERVICES
KETCHIKAN AREA
RECEIVED
MAR 19 '96
FOREST SUPERVISORS OFFICE

	INT.	ACT.	INFO.
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Bradley Powell
Forest Supervisor
Ketchikan Area
Federal Building
Ketchikan AK

Dear Mr. Powell,

RW-1

As a tourist Alaska my husband and I were shocked at the vast amount of area already clear-cutted in the Tongass. Please support alternative 10 which will protect the wild-life and the tourist industry.

Let's help Alaska the last frontier.

Sincerely
Ruth Worock

Responses to Ruth Worock

RW-1 Comment noted. Please note that Alternative 10 is analyzed in detail in the SDEIS.

Comments of Michael W. & Beverly J. Young

12-7-95

Forest Supervisor
Ketchikan Area Tongass National Forest
Control Lake EIS
Federal Building
Ketchikan, Ak. 99901

Dear Sirs:

MY-1

We, as most long time Alaskans, are concerned that the Forest Service is even considering selling the timber in the Control Lake area of POW Island.

We believe that it is time for the USFS to begin a management plan for the Tongass - aimed at making the forest a place for all Americans to enjoy - not a place for KPC to make money at the expense of U.S. citizens.

Unless you - as managers, paid by citizens, can prove that any future sales will be profit making - we request that you discontinue any efforts toward this + other sales.

We are not against our Alaskan small logging operations. The operators that sell their logs to small mills - who sell lumber to us + other U.S. citizens.

Responses to Michael W. & Beverly J. Young

MY-1 Comment noted. Please note that a new Forest Plan for the Tongass has been adopted (1997). Further note that none of the timber from the Control Lake project will be supplied to KPC under the long-term contract.

Comments of Michael W. & Beverly J. Young

MY-1 (cont.)

We are totally against any of our U.S. National forest trees going out of the U.S. ~~[redacted]~~ in any form.

Alaska's congressional delegation doesn't speak for all Alaskans & we believe they will understand that, as they next come up for election.

You work in Alaska - but not for Alaska's timber industry.

Please consider this letter as two votes completely against the Control Lake timber sale & any future sales aimed for L.P. or LPC.

Sincerely

Michael W Young
Beverly J Young

Responses to Michael W. & Beverly J. Young

Comments of Lauri L. Zadina

December 21, 1995

Brad Powell
Forest Supervisor
USDA Forest Service - Ketchikan
Federal Building
Ketchikan, Alaska 99901

CONTROL LAKE DRAFT EIS COMMENTS

Dear Mr. Powell,

LLZ-1 Thank you for the opportunity to make my comments concerning the Control Lake Draft EIS. I was born and raised here in Ketchikan where logging has always been a major contributor to the community. Now as an adult, I make my living in the timber industry. The future of the timber industry is of major importance to me and my family and we would like to see the industry continue for many years to come. I would like to state my preference for alternative 2 because I feel that it best represents the amount of timber needed to be harvested to help maintain and maybe even build the amount of timber jobs in Southeast Alaska. Alternative 2 provides the largest amount of revenues for schools and roads through payments made to local government. I

LLZ-2 believe that Habitat Conservation Areas should not be implemented as part of the planning process. I believe that Honker Divide is an important recreational area and that Alternative 2

LLZ-3 provides a large enough buffer zone to support subsistence and recreation and not visually impair the area. Roads built will provide even more access to areas for hunting, fishing, and recreational activities. Finally, I want to stress the importance of this timber sale for the future of the timber

LLZ-4 industry and that you select the alternative which will provide the maximum volume of timber to harvest under the current forest plan. That alternative is alternative 2.

Sincerely.

Lauri L. Zadina

Responses to Lauri L. Zadina

LLZ-1 Comment noted.

LLZ-2 Comment noted. Note that a new Forest Plan Revision has recently been adopted which incorporates a series of Old-Growth Habitat areas. The Control Lake project area includes a number of these reserves, including a large one around the Thorne River and Honker Divide.

LLZ-3 Comment noted.

LLZ-4 Comment noted.

Subsistence Hearing Testimony

This section of Appendix B includes includes the testimony received at ANILCA Section 810 subsistence hearings. Forest Service responses to substantive comments included in the oral testimony are provided along-side the comments.

Subsistence hearings on the Draft EIS were held in Klawock, Thorne Bay, and Coffman Cove during the comment period. Open houses were also held in conjunction with the subsistence hearings to describe the analysis process and answer public questions on the Draft EIS. An additional open house was held in Ketchikan. Public comments on the Draft EIS were also accepted at that time. Testimony was recorded and transcribed and is included along with responses in this appendix. The testimony includes general comments on the Draft EIS and the project as well as testimony on subsistence. The schedule of hearings and open houses was as follows:

Date	Open House Time	Subsistence Hearing Time	Community	Location
Dec. 4, 1995	6 - 7:00 pm	7 - 9:00 pm	Ketchikan	Westmark Cape Fox
Dec. 5, 1995	6 - 7:00 pm	7 - 9:00 pm	Klawock	ANB Hall
Dec. 6, 1995	6 - 7:00 pm	7 - 8:30 pm	Thorne Bay	Bay Chalet
Dec. 7, 1995	6 - 7:00 pm	7 - 8:30 pm	Coffman Cove	City Hall

Substantive comments within the hearing transcripts have been coded and numbered to aid the reader in finding the Forest Service response to individual comments. Comments and responses are given alpha-numeric designations beginning with "T," which stands for "testimony," and continuing with a 2- or 3-letter abbreviation for the location of the hearing, and ending with a number indicating the sequence in which the comment appeared. Thus, TKLA-2 designates the second formal comment from testimony at the Klawock hearing for which a response is provided. Written responses are not provided when the issues raised were addressed orally during the hearing.

ANILCA Section 810 Subsistence Hearing Testimony
Control Lake Draft EIS
KETCHIKAN, ALASKA
December 4, 1995

Ann Archie. I'm Ann Archie. I'm the District Ranger at Thorne Bay on Prince of Wales Island and this timber sale is going to take place on the Thorne Bay district. I welcome you tonight to the formal subsistence for the Control Lake Timber Sale. The two people who will be running tonight's meeting are our contractors who put together all the maps and did all the on the ground work and wrote the draft EIS that you've been reading. And Tom Stewart is the ID Team Leader, the Interdisciplinary Team Leader, and Mike Galginaitis will be the subsistence specialist who will work us through tonight's meeting. So without any further talk from me, we'll go right into the formal subsistence hearing and I do ask that when you stand, if you do need to stand up, to speak and let us know your concerns, if you'll say your name and spell your last name.

Tom Stewart. Good evening. I'll reiterate what Ann has just said that this is a public hearing for ANILCA Section 810 for the subsistence issues on the Control Lake Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-Term Contract and the Ketchikan area independent sales program. My name is Tom Stewart and I'm the Designated Hearing Officer for the evening. We will be recording the formal testimony and also taking any written comments that you might have. The microphone and recording system that I've been able to get is not the best and I tested it before the evening began and so if...people that give formal testimony and then afterwards if discussion or points or comments about the draft EIS itself, I'd asked if actually you could come and sit up in the chair. The way that I'm speaking right now, just barely records on this from this distance so it really is necessary to get the testimony down to be transcribed so that we can make sure we track all the various issues, it is necessary for people to come and sit in the chair here. When you're sitting to the chair, you're close enough that a normal speaking voice will work quite well.

First off, I'd also like to thank you for coming this evening; we really appreciate it. For the record, this is Monday, December 4 at about 7:04 pm. The hearing is being held at the Cape Fox Lodge in Ketchikan, Alaska. The purpose of the hearing is to get your views on how the alternatives that are proposed for this project may affect your subsistence use of the Tongass National Forest. Other comments about the project will also be accepted. The hearing is officially scheduled to last from about 7 to 9 o'clock, but we'll stay and talked as long as people are interested in doing so. To get it into the record, earlier this evening from 6 o'clock until a few minutes ago at 7, we had a open house which many of you participated in, which we discussed and answered various questions about the various alternatives for the Control Lake timber sale. If you have other questions later, we will certainly be willing to take them. But first we do want to take formal subsistence testimony and if it turns out that we go from the subsistence testimony into more general comments and then someone enters the room or decides that they want to make formal subsistence testimony we'll just so indicate it and take that at that time. So we want to be flexible, but we do want to try to do the subsistence first.

Also, there is a signup sheet outside, which I hope most of you

signed up on. We definitely want to have you on the mailing lists if you're interested in these projects and also there is also a place to sign with an "x" or a "yes" if you would like to receive the draft EIS, if you haven't already. We can have that sent to you from the Forest Service. Also if you decide perhaps in a few days that you might want a copy, I think you can get a copy if you go down to the Forest Service office and request one–they have a few stacks down there of them, and they're available. Also if people care to make comments this evening—written comments this evening—I've placed a bunch of pads with pens around the room, so for those individuals that would like to do that, please do so. It would be useful or you should put your name and address on them so that we can track who's making comments and those will be addressed in the final EIS just like all comments will.

And as Ann said when you do come up for testimony, please state your name and spell it and we'll use the addresses from the list to cross check for people in case we have to contact someone. Sometimes it is difficult with the transcriptions of these, to make sure that we're catching everything.

So with all of that long introduction, I would like to ask if there is anyone that would like to give formal subsistence testimony in regards to this timber sale?

William C. Thomas, Sr. My name is William C. Thomas, Sr. <<spelled>> I want to thank you for taking this opportunity for this important time to listen to these important and sensitive issues. I'm the chairman of the Federal Subsistence Advisory Council for the southeast Alaska region. The membership on this advisory council out of 13 members, those members are residents of various communities in Southeastern.

Our advisory council met in Craig this past September. While we were in session, we had the opportunity to hear compelling testimony focused on preservation of the only productive subsistence use area left in the immediate land traditionally used by the villages of Klawock and Craig. My comments are brief by design. I hope to spare redundancy of specifics that you will hear

TKET-1 or read from others. Our advisory council has gone on record supporting the alternative considered by the people on the west coast of Prince of Wales to be the only acceptable harvest plan. Even that plan is marginally acceptable, at best. This plan is referred to as alternative 10. Most people know this as the Citizen's Alternative.

Let me share with you the result portions from 3 communities—I say result portions for the interest of time and effectiveness. We really want you to know what the residents of those communities say and please be alert to the support given them in this testimony.

TKET-2 From the city of Craig. "Be it therefore resolved, the City of Craig, supports the concept advanced by the Prince of Wales Citizen's Coalition, whereby the Control Lake timber sale will be managed in a manner consistent with the principles of sustained yield and multiple use with responsible and controlled management of access to sales awarded by competitive bid to all interested parties including small business independent operators."

Klawock. "Therefore be it resolved the City of Klawock

TKET-3 respectfully request the U.S. Forest Service manage the Control Lake area under the specifications of the Elevenmile and Honker Divide Citizen's Alternative."

Hydaberg. "Therefore be it resolved that the Haida Tribe ask that

TKET-1 Comment noted. Alternative 10 is included in the main text of the SDEIS and is being actively considered.

TKET-2 Note that all of the Control Lake project timber will be offered for sale through the independent timber sale program.

TKET-3 See response to TKET-1.

TKET-4 the U.S. Forest Service manage the Control Lake project area under the specifications of the Elevenmile and Honker Divide Citizen's Alternative."

TKET-4 See response to TKET-1.

That completes the result clauses of those 3 resolutions. These are

TKET-5 people in an area that stand the greatest negative impact if alternative 10 is not seriously considered. No other inhabited island or land area adjacent to their communities has endured the exploitation of natural resources such as Prince of Wales island. We see much of the same in Ketchikan and here...you hear opposition and response as well as you can. The residents of the affected area ask that if you must harvest that large number of timber, do so other than on Prince of Wales. It is my understanding that alternative 10 is not a priority consideration as the project moves forward. I ask at this time that it be given priority consideration and do the correct approach as the affected people are offering. They have demonstrated much patience and cooperation for many years. I believe they need to be heard. Thank you. That concludes my remarks.

TKET-5 See response to TKET-1.

Tom Stewart. Is there anyone else who would like to make formal subsistence testimony for the Control Lake project? <<no response>>

Christopher Gates. Thank you very much. My name is

TKET-6 Christopher Gates, I'm the Executive Director for the Alaska Forest Association. We have a number of comments to make with regard to the subsistence portion of the Control Lake EIS. Our foremost comment is that we are concerned about the accuracy of the subsistence information provided in the Control Lake EIS. And while we recognize that the models used have been frequently used and cited by the Forest Service to analyze subsistence impacts, we are vitally and very seriously concerned that the accuracy of those models have never been tested for many, many years. They've never been field verified. And, in fact, in this particular environmental impact area, where we have had 10,000 acres harvested over the last 40 years, where we have clear examples of the impact of harvesting in the area that the actually facts of impacts with regards to deer have been put way down the list of considerations versus the theories expressed in models. We would ask that the EIS look hard at the actual impacts—actual hunting levels, actual harvesting levels, actual abundance of especially deer—in the harvest area as the result of 40 years of harvest in this Control Lake EIS area. In fact, we see populations substantially increased. We think that subsistence—those that are actually interested in harvesting deer—would see a tremendous increase in average harvest and yields per acre. The abundance and the flourish of new food sources for deer produce abundant habitat for deer that's been recognized and actually has taken place in this area over the last 40 years. So we would suggests that actual facts be used over models where they exist and we would urge that to be done and a supplement issued regarding subsistence impacts so that people can really understand what the facts are, not what the theories are with regard to this use. We have more comments to make with regard to general comments on the EIS, but that's really all I'll say on the subsistence side right now.

TKET-6 Comment noted. The wildlife habitat capability models have been given less emphasis in the SDEIS. Please refer to the response to JEC-1 in Appendix B regarding your comment on the benefits of timber harvest for deer.

William C. Thomas, Sr. Can I make one addition?

Tom Stewart. Certainly.

William C. Thomas, Sr. When we were for the subsistence uses, this is only a single component of that use agreement. Our subsistence really has a wide diversity and variety that not

everybody is familiar with. I just want to include that in my comments. Thank you.

Tom Stewart. Is there anyone else who would like to provide the formal comments, testimony on the subsistence issues? <<pause>>

Unidentified Speaker. Well, my comments are pretty short and they are both general and they both bear on subsistence I'd like to combine them...<<interruption>>

Tom Stewart. Could you state your name?

Eric Muench. Sure. My name is Eric Muench <<spelled>>. I live in Ketchikan. There's only 10 percent of the Tongass National Forest which is dedicated to timber management and this is part of this 10 percent and therefore I think it is very important that the production of the timber that has been targeted to meet the purpose and need of the timber program—in other words the 187 million—be realized at least from this harvest area. If it is not, and if it is cut back to the extent that the Citizen's Alternative—or approaches of that sort would suggest—to less than a 1/6 of the need for timber from this area. Then I think what would happen if that kind of a reduction happened all over that 10 percent of Tongass which has been dedicated to timber cutting, you would find that a great many people would have to—out of necessity—turn to subsistence hunting and gathering just stay alive. And that would put so much pressure on the wildlife, the available wildlife, and the various subsistence resources in the area that it would make it very, very hard on those very few people on Prince of Wales or southeast that genuinely do depend on subsistence. And most of this, the harvest, in for example alternative 2 or 7, takes place far inland and is accessible only by roads and is in areas that in the past would not have been available to subsistence users since most of that accessibility has come, by way of, boats and being close to the beach. So I would ask then that you pick an alternative or a combination of units that comes at least to the volume outlined in the...you know, that reaches the total that matches the purpose and need of this timber offering to start with. Thank you.

TKET-7

Tom Stewart. Is there anyone else who would like to make a subsistence testimony at this time?

John Clifton. My name is John Clifton. I live at Post Office Box 9006, Ketchikan. I am the Subsistence Member on Southern Southeast Regional Aquaculture Associations Board, although I am not speaking on that behalf, I'm speaking as an individual. In the area of subsistence and on this current timber sale, I've got to admit that most of my food comes from a grocery store; however, the majority of the seafood and the red meat that I eat is gathered from the land. Most of the red meat is deer and most of that I harvest from clearcuts. I also own property that is within 2 miles of the southwest—pardon me, southeast—corner of this timber sale and that area has been intensely logged over the past 50 or 60 years. I don't have the specific dates, but there's evidence of hand logging, a-frame logging, and then the more recent clearcuts that have gone on in the area. Not only do I catch fish, but shellfish of a variety of forms, and as intensely logged as that area has been, I don't really see that there's a negative impact on that as it affects my use of that. Now I do have concerns that the cuts be done in a responsible way so that it doesn't adversely affect the water temperatures in the streams, but I think that's addressed by the setback from most streams. I just look at it as a user of the products that come out of there. There seems to be an abundance even though there seems to be a growing number of people fishing and hunting in the areas that I go to in this part of the timber sale. So I just...I don't count pellet

TKET-8

TKET-7 Comment noted.

TKET-8 Comment noted. Please refer to the response to JEC-1 in Appendix B regarding your comment on the benefits of timber harvest for deer.

TKET-8 (cont.) samples I just see the deer populations. I don't count wolves, but I see the wolf tracks in my footprints, you know, a day after I've been there, and there certainly seems to be no shortage of those. I don't know if you can include a harvest of the wolf population along with some of these units, but they seem to be thriving. I don't see any need for having any habitat conservation areas in these sales areas. Although I have not first-hand driven most of these, I have been on some of them, and have flown over as a casual...riding in an airplane. The trees seem to grow back just fine, and so do the animals. I don't know if you have any questions. That's all of my comments. Thank you.

Tom Stewart. Thank you. Is there anyone else who would like to make formal subsistence testimony in relationship to this project? <<no response>> So with that then, we will go to more general comments about the EIS. Because of the need to be able to hear you on the recorder, I would still ask people to come forward and give their names in relationship to that. And if anyone does want to make formal subsistence testimony again or later, someone else that comes in, or any of you here. We'll open it up then to more general comments and try to answer questions or just listen to the comments. Anyone that would like to come forward...

Cliff Taro. I'm Cliff Taro <<spelled>>, President of the Southeast Stevedore Corporation, Ravella Tug Company, PMX Towing Company, and Temsco Helicopters. I want to go on record favoring alternative 2 for the best interest of my employees who are

TKET-9 dependent upon the forest industry for their and their family's' economic future. We have over 100 employees that require that a healthy timber base for survival. This timber sale would help both large and small forest industry operators, which in turn would help our employees and the domino effect will help most of the people in our area. No habitat conservation area should be required as part of this project. More than enough land has been set aside for this purpose. Thank you.

Tom Stewart. Whoever would like to come up next, feel free. I know that there's probably some people who would like to make comments.

Chris Gates. My name is Chris Gates, again. And I would like to make some general comments, but I would like these recorded and dealt with as subsistence comments because I, too, believe that as we force disturbance into society that we would be forcing more impact onto the land that we are discussing here tonight and those impacts are worthy of consideration with regard to this EIS. But the Alaska Forest Association would like go on record as supporting alternative 2, and in fact we would like to go on record as suggesting that the concentration of impacts in alternative 2 is in

TKET-10 the best interest of the forest as a whole and is in the best interest in the mission of the Forest Service. We suggest that by just pointing to the fact that if we can concentrate impacts into areas that have shown they're capacity for absorbing—not only absorbing impacts—but actually prospering the people of the area while protecting habitat values, while protecting populations as shown through historical fact, that we are reducing the possibility of new intrusions into other areas, other pristine areas, we're reducing net overall impacts to the forest as a whole. So we think it makes good sense—not only from the economic, social, and cultural point of view—but also from a wildlife, and a habitat, and an aesthetics point of view to limit impacts to new areas of the forest as much as we can. It certainly helps us to use, existing core roads—it helps us to go off of roads that have already been put in years ago that have worked very successfully and, in fact, which people now rely upon

TKET-9 Comment noted. Alternatives 2 and 7 have been deleted from detailed consideration in the SDEIS because they are strongly inconsistent with the 1997 TLMP Revision.

TKET-10 Comment noted. However, refer to response to TKET-9.

TKET-10 (cont.) for recreation access and for fishing and for tourism access—to build a timber base upon. As opposed to building whole new core areas, core roads, new islands that are impacted, new log transfer facility, whole new section of the forest, watersheds and ecosystem, that would not have to be impacted if we could concentrate impacts into areas that could absorb it. So we do suggest that alternative 2 provides the net benefit, in terms of wildlife, recreation, and values, other than timber economies with regard to this timber sale.

We would also like to point out that on page 4 of the summary report the Forest Service agrees that the amount of timber being made available will fall well short of that required under the contract for KPC. And that this timber sale area is an absolute essential timber sale for the Forest Service to honor its commitment

TKET-11 and its contract with KPC and to independent and to SPA users of timber. So if there's going to be a mistake made with regard to this particular timber sale, we hope that they would error on the side of providing enough timber to sustain jobs and economic activity and culture of the area. We agree that the Forest Service will not have enough timber, if they keep substantially reducing its timber sales as the have over the last four years.

We have concerns about the Alaska Coastal Management Program and the consistency determination on this EIS and would like to be brought up to speed on that issue if it is appropriate to ask that question at this time. We'd also like to point out that it appears to us that habitat conservation areas, in spite of the law passed by Congress and signed into law by the President this year, that there

TKET-12 are habitat conservation...de facto habitat conservation areas being established in this timber sale area greater than 300 acres. And "A" we don't think they need to exist; "B" there's absolutely no empirical data showing any benefit by them, but also we really suspect whether these are appropriate under law.

Tom Stewart. Would you like me to respond to those last few comments?

Chris Gates. Sure.

Tom Stewart. In regards to the Alaska Coastal Zone Management Consistency, that is done after the final EIS and is not really dealt with at this time, though we keep it in mind in terms of making sure that we're applying standards and guidelines and best management practices so that we are meeting the water quality requirement and those types of issues. I'm not sure what the procedure is specifically now, I don't know whether it's changed, in the past there has been meetings between the State and the Forest Service after the final in regards to the consistency and various issues are hammered out and discussed. In regards to the HCA's, we have not established or proposed the establishment of the Habitat Conservation Areas in these alternatives. What we have done is response to issue in relationship to wildlife viability and in that regards, we do talk about HCA's because they have been...for example the Viable Population Committee report has recommended them and with specific requirements and that sort of thing. The old growth blocks that we do show—which are the purple lines on the various maps, for those of you who may have not noticed them—but there what we're trying to show is what level of old growth blocks—relatively unfragmented ones—existed after implementation of any given alternative. So that gives one way of evaluating the alternatives in relationship to wildlife issues and issues that people have brought up in regards to long-term populaces viability. So we're responding to them, in a sense by providing information, but not formally in any way proposing

TKET-11 It should be clarified that the statement on page 4 of the Summary refers to the situation that no additional timber is made available to KPC after fall 1995.

TKET-12 Comment noted. The Control Lake project does not create any de facto habitat conservation areas.

HCAs.

Chris Gates. Thank you very much. Two concluding comments. If it walks like a duck, and quacks like a duck, it usually is a duck. And large blocks of land set aside for wildlife viability issues were only called HCA's in the VPOP Report because that was only thing they were allowed...the only method they were allowed to look at. We suggest that the large blocks of lands set aside for protecting

TKET-13 viable populations, also are de facto HCAs, and really violate the...without any empirical basis for it, without any empirical evidence for the need…violates the base of the intent of Congress in their instructions to the Forest Service. And we would just encourage that issue to be looked at again.

Lastly, I'd like to say that there's been very little land set aside in the Tongass National Forest to support of 30 percent of the non-government population in the southeast that relies upon the timber industry. There's about 10 percent of the overall national forest that has been set aside. And in this designation, these LUD—land use designations—this particular piece of land has

TKET-14 been set aside for years and years for what's called intense resource use. We suggest that 2,000 acres, excuse me, 9,000 acres out of 200,000, does not come up to the word intensive resource use, does not come up to what was envisioned when the plan was put together years ago. It certainly will require, with this kind of use of the land—this 5 percent use of the land concept—will require intrusions into many other areas of Tongass National Forest that would not have to be intruded upon, it would not have to be contacted, if in fact, we did intensely use certain pieces of land that have been set aside. So the Alaska Forest Association thinks it's good business, where everybody wins, that in fact everybody wins—the subsistence users, communities, wildlife and people—if in fact these lands, these specific lands, key lands are more intensely used than others. And we would suggest that not only is alternative 2 too low in our mind, but that it be re-looked at again to actually meet the intent of intensive use. And with that I'll say thank you very much.

Tom Stewart. Thank you. Appreciate that. The next person or another person who would like to speak. <<pause>>

Marcel LaPerriere. My name is Marcel LaPerriere <<spelled>> Yes, it is French. I'm here basically to say that I think that alternative 10 should be very seriously looked at. This area, the Control Lake, affects the people in Craig, Klawock, and Thorne

TKET-15 Bay and these people pretty much have all come out and said that they want to look at alternative 10 as a viable option to harvesting this area. I think it would be the most beneficial for the people in that area. As a landowner on north Prince of Wales, it would also impact me. And I, again, support alternative 10 over any of the other alternatives. I would also like comment. I'm the President of the Glacier Grotto which is the local—I shouldn't local, it's the State Chapter—of the National Speleological Society. We're concerned about caves and karst. I have to commend the Forest Service, especially in Ketchikan area for the stand they've taken on

TKET-16 the caves and karst. I'll be the first to admit this area is fairly void of karst and caves, having hiked through many of the units myself personally, I know this to be a fact. But there is still caves out there and there is still karst in this area, and we are concerned that the caves and karst will be damaged. The caves and karst that are in the Control Lake area tend to be very scattered and very hard to find, they're small units—sometimes being as small as 5 or 10 acres of karst. We're concerned for those little 5 or 10 parcels that may

TKET-13 The blocks shown in the DEIS were not to be "set aside;" rather, they were shown to demonstrate the effects of each alternative on the remaining blocks of unharvested/unroaded areas.

TKET-14 Comment noted.

TKET-15 Comment noted.

TKET-16 Comment noted. See response by Tom Stewart following comment.

TKET-16 (cont.) not have been seen during the cruising of this area. I personally spent 12 hours one day, looking for one little tiny supposed area of karst, and we finally found it, but I mean, that's how tough they are. It was a 4 hour hike in and a 4 hour hike back and 4 hours looking for it. So, what I'm saying is that they're there and I think they could have been overlooked and we're concerned that these areas will be damaged by timber harvesting and road building. So basically, that's all I have to say. Thank you very much.

Tom Stewart. I'll make a general comment about the caves and karst. We did identify some in the area, some units were dropped because they had fairly high concentrations. A couple of others were...the units were redrawn, and the roads were redrawn to mitigate any potential effects. Those particular areas need to be looked at again during final layout to make sure what we our reconnaissance has seen and what we have suggested, that it meets the standards and guidelines. And the general dispersed nature of karst in this area is something that we've noted in the EIS, so the Ranger District is aware of it in terms final layout for all of the units. Additionally, there is the karst vulnerability procedures that are being applied to the whole Ketchikan area, particularly out on Prince of Wales island so that, that will also be considered.

Anyone else? Who would like to be next?

Jerry Hope. My name is Jerry Hope and I'm not...am President of the Tribal Council on Ketchikan—the Ketchikan Indian Corporation, IRA Tribal Council. And although the KIC and Tribal

TKET-17 Council have not sat down and made an official stand on the Control Lake project area, it is our Council's usual policy to acquiesce and go with the wish of another tribal council in that area. And Control Lake is on Prince of Wales island, there's, I think there's 1..2..3..4 tribal councils on Prince of Wales island—Kassan, Hydaberg, Craig, and Klawock. In speaking with Aaron Isaach, Jr., who is the Vice President of the Klawock Cooperative Association and that tribal council, it is their position that the area be protected. And I can say, that the tribal council in Ketchikan in dealing with a separate issue can understand and appreciate the KCA's position and the other tribal governments' positions as well on Prince of Wales Island.

One issue that is separate, but similar is the Swan Lake-Tyee Intertie. It was our position that no roads be built on that project and there is some strong concern regarding the damage to the

TKET-18 traditional use of that area for the Tlingits, Haidas, and Simshians. And word got back to us from the Forest Service and other governments, that they're going to do what they darn well please anyway, regardless of KIC tribal council's position. Be that as it may, we take our position. We would take our position to acquiesce to the Prince of Wales Island Tribal Governments, but at the same time support their wishes. And it is my further understanding that our position that we took with the Swan Lake-Tyee Intertie project is something similar to what tribal governments' positions would be with the Control Lake area. We understand and can appreciate with a degree of sensitive regarding the economics of the area, but at the same time, we have to raise the serious question about what potential damage can be done an the area, to the uses of the people who have to live on that area, after logging is done. Thank you.

Tom Stewart. Thank you. Next speaker or commenter. Who would like to be next?

Shelly Stallings. My name is Shelly Stallings, I'm from Ketchikan.

TKET-17 Comment noted.

TKET-18 Please note that the unroaded option was the preferred alternative in the Swan Lake-Lake Tyee Intertie Record of Decision. Also refer to the response to JHP-10 in Appendix B regarding the development of roads in the Elevenmile area.

TKET-19 Comment noted.

TKET-19

I would also like to speak towards the Citizen's Proposal, number 10. 1 believe that that is the one proposal that looks at the long-term view. I'm one of the people who believe that the Forest Service, at least for the last 40 some years, has not had a sustainable forestry practice here in the Tongass and I think it is time for us to switch over to a more sustainable harvest which is much lower than what you've been doing in the past. I think we need to listen to the people on Prince of Wales. They're the people who live there. Prince of Wales has been called a national sacrifice area for many years because of the extensive logging in the area and I think it is time to change that on Prince of Wales. Thank you.

Tom Stewart. Is there anyone else who would like to speak or comment? We still have another entire half side of tape here, I can turn it over. <<no response>> If it's true that no one wants to speak to the microphone here, I guess I will conclude this formally. Shut off the machine here on a moment, but I'm more than willing to stay for some period of time if people still have any specific questions. A few people did come in late. Maybe I'll just reiterate one more time—since a few people did come in. We had formal subsistence testimony in the beginning, and we shifted over to more generalized comments. If there is anyone who would like to make more formal subsistence comments or testimony, before we're done here, please do so...please come forward. <<no response>> It doesn't look like there is anyone that wants to do that, so I will formally conclude this and shut off the tape recorder in a moment. I really do thank you all for coming. All your comments are important to us and I'm sure we'll be getting many more in the next few days. If you want to make any written comments on these note pads, please do so, put your name and address on them. If you haven't signed up outside, please do so, we would like to have you on our mailing list. If you do want a copy of the EIS, please put a little 'x" or "yes" in the last column over. With that I'm going to shut off the machine and thank you all very much.

ANILCA Section 810 Subsistence Hearing Testimony
Control Lake Draft EIS
KLAWOCK, ALASKA
December 5, 1995

Ann Archie. We're going to be recording the formal subsistence hearings and we don't have the microphones that our contractors have so we're going to use these, small ones. The good things about is that you don't have to get up and walk to microphone and sit down and give your hearings, I'll just hand this to you when you want to give your hearing—or your testimony. So you don't have stand up and move.

So let me get started with this. This is a public hearing for ANILCA Section 810 for subsistence for the Control Lake Environmental Impact Statement for Ketchikan Pulp Company Long-Term Timber Sales Contract and the Ketchikan area independent sales program.

I've been designated the Hearing Officer for tonight's proceedings. We will be recording any formal testimony and we'll also be taking your written comments if you have any that you'd like to offer us before the evening is over. I'd like to welcome you and express our appreciation to you for coming this evening and sharing with us your views on the Control Lake proposal.

For the record, today is Tuesday, December 5. The time is 7:15, the purpose of the hearing is to get your views on how the alternatives proposed for the project may affect your subsistence use on the Tongass National Forest and other comments about the project will also accepted. The hearing is scheduled to run from 7 to 9, but we'll go as long as it takes to make certain that we have all the comments you'd like to make about the project this evening.

What we'll do, right now, is take any formal subsistence statements you may have and then once that is over—with the formal subsistence...with how any of these proposals would affect your subsistence use and your ability to have subsistence on this area—and then we'll close the formal subsistence procedure, turn off the microphone and we can go back to an open house, or we can just entertain any other kinds of questions that you have. Charlie and I will try to answer your questions that you have to best of our ability, but since the contractors aren't here if you have some really technical questions about economics or some of the vegetative—the silviculture prescriptions—for any particular units, we can take your question down and we can have the contractor write you the answer. So you will have an answer to your question.

So, I would like to open this up then for any formal subsistence testimony. Is there anyone who would like to give formal subsistence testimony on the Control Lake Timber Sale.

<<Inaudible question from unidentified audience member>>

Ann Archie. Yes, this Control Lake Timber Sale encompasses the Elevenmile Area.

<<Inaudible question from unidentified audience member>>

Ann Archie. Well...*<<interruption>>*

<<Inaudible question from unidentified audience member>>

Ann Archie. Let me show you the map. There are proposals. Yeah, there are different proposals with different alternatives for harvest levels. Some of them have some harvest in what is called the Elevenmile area up in this corner, but this particular Alt. doesn't have any harvest. If you look at these little yellow spots here, those are the proposed timber harvest units. So in this Alt. there aren't any harvest units in the Elevenmile area.

<<Back and forth discussion between Ms. Archie and unidentified speaker away from the microphone regarding the boundaries or description of Elevenmile area. He seems to be asking about what areas will be harvested and in what area; where the river is located; and other general questions about the maps and alternatives. Ms. Archie and Charlie Streuli answer his questions and try to explain—one by one—the different alternatives, buffer zones, harvesting areas, maps, etc.>>

Ann Archie. So, what I'm looking for now is if anyone has formal subsistence testimony to give. And when you give the testimony if you would state your name and spell it for the record.

TKLA-1 **Arthur Denver (??), Jr.** My name is Arthur Denver, Jr., I'm from Klawock and we hunt around Elevenmile area and right now it is pretty restricted pretty much to the local areas. And I don't think there's that much timber around there—might be good timber—but there is a lot of rivers around there. Of course the rivers will be affected by the cutting of the timber, and I don't think it would be wise to cut the trees down in that area.

Ann Archie. Thank you.

TKLA-2 **James Williams.** My name is James Williams. I'm am definitely against logging in the area—Elevenmile area. I speak against it because that whole area, there is a lot of creeks, a lot of streams in there where the migration of the salmon comes in there they hit those creeks. Right now, if we get in there, we're going to damage everything. As you can, Big Salt Lake, there is hardly any return. There is hardly any return in Tawah (???) Lakes, too because of all the logging area in there. Everything in that area—Elevenmile area—the halibut, the red snapper, the fish eggs, the kelp, the deer, the wolf, all of that is in that area right there. We get in, that's our last resort. We could just kiss this area goodbye if we start harvesting that area. I speak against it.

Ann Archie. Is there anyone else who would like to give formal subsistence testimony on the Control Lake Timber Sale?

TKLA-3 **David Johnson.** My name is David Johnson. The comments I am about to make represent my own personal views and not do represent the Forest Service views, nor any other federal agency. The comments that I am about to make represent my concern with respect to Sitka black-tail deer and steelhead, both of which are subsistence species as identified in the 1996 federal subsistence regulations. In all the alternatives as shown in the summary portion of the EIS, in every alt. Sitka black-tail deer habitat is reduced by some percentage. These percents range from zero—in the No-Action Alt.—to as much as 6 percent. That in itself, may not seem like very much, but in the context of the adjacent land ownership and the amount of timber harvest that's occurred, both on national forest lands, and on private and native corporation lands and state lands, it may represent a significant reduction.

TKLA-1 Comment noted. Please note that each of the action alternatives under active consideration avoids the Elevenmile area from partially to completely.

TKLA-2 Comment noted. See response to TKLA-1.

TKLA-3 Comment noted. Please note that the alternatives considered in the SDEIS generally have lower effects on deer than those considered in the DEIS. In particular, Alternatives 2 and 7, which had the highest predicted effects on deer, have been dropped from detailed consideration.

TKLA-4 My second point with respect to steelhead, which is also a subsistence species, on Prince of Wales, particularly for the community of Klawock, there is no analysis that I can determine in this summary that has been done specifically for habitat alteration or reduction for steelhead. These are my concerns. Again, my name is David Johnson. Thank you.

TKLA-5 **James Martinez.** My name is James Martinez. My mother was Mary Dick and my father was Peter Dick who are full-blooded Indians. I am a full-blooded Tlingit and I was born and raised in Klawock since 1933. I lived across the bay and I've watched this town grow. In the days that I was living here, we subsisted all along the shore from Klawock all the way out to Kerheen. We trapped, we went hunting, we went fishing up there. And now that place is reduced, Karheen was logged, Sarheen was logged—where my family has come from. Now we're down here...we're fighting over a little piece of land or trying to keep them from logging a little piece of land which is the last part of our native heritage—our native cultural—which could be found there. And all along the shore between here and Karheen and all the way up to Shakan you'll find some graves that were dug because they couldn't keep the people from bloating and snowing. They had to bury them where they were. So now these were all dug up or degrade by logging back in the '40s and all the way down to the '50s there was A-frame logging. Now we're going down to around Elevenmile. Right across from Elevenmile there is a little village—there use to be a little place where the people would go, we called Bob's Pass. Right on the point there, you can see where the people made gardens so that they could subsist. You see, our native people, we never stayed in one place, we moved all over, some of the people owned the rivers here, some of the people own the creeks all over. That was the reason way we had all the fish. It was because when you came that creek you had to get permission from the native people that owned that. And even here in Klawock, you had to get permission from the people that owned this creek here. And there was plentiful food here, and they'd say 'go ahead, help yourself' You know, us native people we never said don't belong here, you guys better move some place else. We've always said there's room here, come on, there's plenty for all of us. Now it seems like nowadays, when the federal government moved in here and Tongass became Forest Service land, they asked us 'Where did you get your subsistence from?' And we would tell them and they would go degrade it, mess it up, and we'd loss it. Then they come in here and ask us, and we'd all hold back and wouldn't tell them nothing. You know, maybe that's the reason why there's nobody here tonight, none of our native people are here tonight. It's because they don't trust the federal Forest Service anymore. Because they tell us one thing and then they go and do something else. Seems like KPC from Ketchikan is the one that's...is saying, 'Hey, we want this.' and they get it. Us native people and the people that have been living around here for centuries, quarter of a century, or a half century, when we speak it don't mean nothing because we don't have the money and money is what's talking. And, you know, for the federals to give the KPC the money, or the trees, for $6 or whatever they're paying for it, and then they ask the small loggers to give $667 for a thousand, there's got to be something wrong. Small people, they don't make very much, it's the big giants that are making it. And us native people we would like to see Elevenmile left alone. We don't want to see any roads in there. And they're telling me 'Well, it's got to be protected land.' It seems

Response to Comments

TKLA-4 Note that effects on steelhead habitat are represented in the DEIS by effects on Management Indicator Species— coho salmon, pink salmon, and Dolly Varden char. In particular, the coho salmon life history is similar to that of the steelhead (see page 3-44 of the DEIS). Also, check the index in Chapter 9 for a listing of 6 specific pages where steelhead are addressed.

TKLA-5 Comment noted. Please refer to response to TKLA-1. Also note that all timber from the Control Lake project will be offered for sale through the independent timber sale program.

TKLA-5 (cont.) like there's nothing ever protected in native lands, everything is gone, everything is degraded by the federal government. It will never change. Even now, I can't understand...we just asked them to leave that little part alone and they're saying 'Hey, KPC wants the wood, they need. And we're giving them a couple hundred board feet.' So my concern is that when the deer...the population of the deer...when they don't have a place to breed and to live by themselves.... And us human beings—what we call human beings—are messing the Earth up. I was taught when I was a young man—or a young kid—that when we killed something we gave something back to the Earth because this Earth was taking care of us. And I still do that. It's our ways, it's my culture, to give something back that gave something to me so that I could live. I've got 2 little kids and they're growing up...and when the get big they won't have nothing. These are the things that we have to look at. Christ, they took everything from us. All we're asking is that they leave some of our places alone. That's all.

Ann Archie. Would anyone else like to give formal subsistence testimony for the Control Lake Timber Sale?

Jerry Sherrard. My name is Jerry Sherrard I live in Craig. I was a

TKLA-6 member of the Control Lake Citizen's Coalition, who drew up what is known in this document in the Appendix as Alternative 10. The Control Lake Coalition will make more formal written comments before the period closes, tonight I'm just addressing as a private citizen. The written comments will deal more with technical issues, tonight we're just talking about subsistence issues mostly. The Control Lake Citizen's Coalition was a wide, diverse group of people that consisted of both Alaskan natives, local residents, property and business owners, independent loggers, environmentalists, conservationists, professional guides, biologists, and commercial fishermen. Our purpose was to design a logging plan for this area that addressed the needs of the local resident for both right now and for the long-term future. Our primary criteria consisted number 1 of sustainability of the forest, sustainability of the wildlife and the habitat for wildlife and the future habitat necessary for wildlife and to protect the most important fisheries on this island and the fisheries habitat. Especially recognizes the important cultural, historical cultural, and subsistence needs of the people that live within the area. And also, addressing the needs of the independent small business loggers who also work in the woods. We felt that the Forest Service alternatives, all of them presented, were a good example of result-driven decision-making where they...purpose and need was set before the scoping to the public and at best this violates the spirit of NEPA and at worst—and most probably—will eventually be deemed illegal. Deciding the outcome and the purpose and need before scoping and nearly defining all the alternatives, we think is very wrong-headed.

TKLA-6 Comment noted. A proposed action was defined prior to scoping. The purpose and need and the alternatives were not.

TKLA-7 Honker Divide is a world class recreation area and deserves a special recognition. Even in 1975, then Governor J. Hammond, proposed that this area be set aside, 20 years later it's back on the chopping block.

TKLA-7 Comment noted.

TKLA-8 And I'd like to address some the independent logger concerns. This area is especially important for the logging families that live in this area. Pay taxes here, contribute to the communities here. Control Lake is central to all the communities—Naukati on the north, Thorne Bay on the east, Klawock, Craig on the south, also Hollis—makes it a

TKLA-8 Note that all timber from the Control Lake project will be offered for sale through the independent timber sale program.

TKLA-8 (cont.) perfect sale area for the independent sale program. Loggers would not have to leave their families to go to spike camps in remote areas to log here. They could go home.

TKLA-9 Coming to the issue of subsistence, to ignore the traditional areas of Elevenmile—the subsistence areas of Elevenmile—such as the Klawock people have used for a long time is especially callous. After CPOW is cut and all the native lands to the south, the cumulative effects of this are going to be especially hard in the Control Lake area. The pressure from all the folks moving onto the island is going to be put on the Elevenmile area. That's why it is especially important to leave such large blocks such as Honker Divide alone. Thanks for the opportunity to testify.

Ann Archie. Would anyone else want to make formal subsistence testimony on the Control Lake Timber sale?

TKLA-10 **Tim Bristol.** My name is Tim Bristol, and I'm here representing the Southeast Alaska Conservation Council. SEACC is a conservation organization that represents 12 volunteer...15 volunteer citizens groups in 12 southeast Alaska communities. SEACC supports the Control Lake Citizen's alternative, known as Alternative 10 in the draft EIS. Essentially for 3 reasons, it stays out of the Honker Divide; it stays out of the Elevenmile; and it provides wood to independent operators who have been treated as second class citizens. They don't have the luxury of a 50-year contract to do business with ... it is pretty apparent that this type of approach has been met with a lot of support here in Craig and Klawock and some of the other areas. There's been resolutions of support, at least in theory, of the Citizen's Alternative from the city of Craig, the city of Klawock has supported it—the Control Lake Citizen's Alternative—the Haida tribe and Hydaburg has supported it and also the Craig IRA has come out in support of the Control Lake Citizen's Alternative.

When it comes to subsistence, of course everybody knows the value of Elevenmile, from talking to people like Mr. Martinez and things like that. This has been going on for several years now. I think they've made it abundantly clear that they do not want to see any logging in Elevenmile. According to Forest Service documents, each of the alternatives that are under consideration night now, would create a significant possibility of significant restriction of subsistence use. I'm not exactly sure what that is suppose to mean, except that it doesn't sound good for subsistence. Also dove tailing into that, is the...if there's going to be restriction in subsistence that also means that there is going to be restrictions in sport hunting opportunities for folks in the project area.

As far as the Honker Divide goes, it is the best canoe route in southeast Alaska, there's only one that even compares to it on Admiralty Island, it's fantastic steelhead habitat, it's fantastic trout fishing. The Alaska Department of Fish and Game has for 30 years now recommended that the Honker Divide get special protection. That means from ridge top to ridge top.

And as far as when you get to the economics of this sale, the Citizen's Alternative is the only alternative that brings a positive return to the federal treasury. It says within the summary the draft EIS that the issue of below-cost timber sales came up and it was not identified as an issue that was within the scope of this since this is an individual project. And the idea of below-cost timber sales is a

TKLA-9 Comment noted. Please note that each of the action alternatives in the SDEIS avoids the Elevenmile and Honker Divide areas from partially to completely.

TKLA-10 Comment noted. Note that alternative 10 is in the main text of the SDEIS and is being considered in detail. Also see responses to TKLA-1, TKLA-5, and TKLA-9.

national issue. From my perspective, you've got to start somewhere and I think this is the place to start with. Thanks.

Ann Archie. Thank you. Would anyone else like to make formal subsistence testimony. We can take general comments after the formal subsistence testimony is over. So if anyone would like to make formal subsistence testimony. <<*pause*>> No one has any more to say on the formal subsistence testimony so I'm going to conclude the formal subsistence hearing and we will open now for general comments or more open house if you'd wish to view the alternatives and we can answer your questions. Thank you.

<<noise, tape interruption>>

TKLA-11

Ernest Ness, Sr. My name is Ernest Ness, Sr. I am a Klawock IRA Council Member, I'm also a City Council member. And I'm the recent elected President of the Alaskan Native Brotherhood. It was stated before, I'll state it again, that I object to any cutting whatever in the Elevenmile area. Reasons for being, I'm sure you've heard time and time again, is for our own subsistence way of living. We've done from time memorial, and I'll go on and object until doomsday, if necessary, I'd would want to see every cutting to come to a complete halt. Although, I would appreciate it if things were still down somewhat on Prince of Wales Island. We have been pretty heavy in the past years not only with the Forest Service, but with our own local corporations, of which I belong to Klawock-Heenya. With everything hitting, beside Scalaska if you go down and look over Prince of Wales Island there's talk of tourists coming in. They don't like to see clearcuts, I don't like to see clearcuts. I fought against cutting so much timber .. <<inaudible>> ... for that reason alone...that's because of clearcuts on this island ... people have gotten hurt in the steep areas.

To get back to Elevenmile, there is a nesting area in Elevenmile for American Eagles and with that I really strongly object to any cutting in that area. They teach their young to fly. There's a valley in there if you look at it, you can walk in there. You can find all the feathers I need for my dance...I can pick them up off the ground because that's where their young learn to go, they soar, and they fly, if you look at it you'll see them. And then, if it's open and you're going cut in there, any roads built in...our way of life as we know today, will be gone tomorrow. What we know yesterday is no longer here today. And they learned of our abalone. We use to be able to go to Elevenmile, out in those areas, around Fish Egg and get all the abalone that we need for our way of life, for our subsistence use that we fed our children with. We can no longer do this because it's depleted...there's just nothing left. Now there going after our yan, known to anybody else as sea cucumbers, once they learned that this is edible they've gone and marketed it as well. And now we have to go...where I use to go 45 to an hour...I go now 2, 2 and half hours out in order to get what I want...find what I'm looking for. It's devastating to my people, our people, our way of life. I don't go out and tell people, you can't have beef no more or you got to cut back on it or I'm take a lot more from you so I can have more in my yard. We're asking give us an even break. Let's not do anything in Elevenmile, if any all possible. Although I will stop and look at some of the alternatives, although what I've looked at so far, I didn't care for and again my objection is strongly to stay out of Elevenmile area. I know there is a lot of concern about the other areas with other people, but I'm sure as I stated before, you're going to get that from

TKLA-11 Comment noted. Please refer to response to TKLA-1.

TKLA-11 (cont.) everybody. It's going to be hard to find a happy medium from anyone. But it's something that the entities are going to have to look at and sit down and sit back and negotiate to someone and see if we can't come to some happy medium somewhere. It's been a long time coming, it's been—what 4 years coming to what we've got today that I can recall—with the meetings with the Forest Service itself and I'm willing sit down and meet with the Forest Service anytime, anywhere. When I went to the symposium had in Kctchikan, I objected to any cutting in the Elevenmile area then with the workshop that was held over there, I stated my objections. And it never changed. It's just that it is our last real place of subsistence use, that we use pretty heavily And for that reason I strongly object again to anything in Elevenmile area. Thank you.

Ann Archie. Thank you.

ANILCA Section 810 Subsistence Hearing Testimony
Control Lake Draft EIS
THORNE BAY, ALASKA
December 6, 1995

<<Barely audible speaking from Ann Archie about Foster Wheeler's role with the EIS. Turns the microphone over to Tom Stewart.>>

Tom Stewart. Good evening. Hello. This is a public hearing for the ANILCA Section 810 for Subsistence for the Control Lake Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-Term Sale Contract and the Ketchikan area independent sales program. As Ann has said my name is Tom Stewart and I've been designated the Hearing Officer for tonight's proceedings. We will be recording this as formal testimony and we will also be taking written comments if you have any before the evening is over. And I have put some tablets with pens for you to write anything down if you want to and also you can send more formal written comments to the Forest Supervisor's Office in Ketchikan and that number is...or that address rather is in the Draft EIS both in the summary and in the Chapter One of the main EIS.

<<Audience member asks barely audible question of Tom Stewart about comments being taken.>>

Tom Stewart. Yes, all comments, verbal, the recorded ones, and the ones that written either on these tablets or ones that are sent in by mail, all will be consolidated and considered in producing the final EIS.

For the record, tonight is Wednesday, December 6, the time is now 7 o'clock. This hearing is being held in the Bay Chalet in Thorne Bay, Alaska. The purpose of the hearing is to get your views on how the alternatives proposed for the project may affect your subsistence use of the Tongass National Forest. Other comments will also be accepted. This hearing is scheduled to run from 7 to 9, but we will do it as long as it takes to get everyone's comments. We held an open house earlier this evening, from 6 o'clock until 7, to provide information on the project and various alternatives which you see laid out here in the various maps. The purpose of this was to answer questions and take comments on all the issues pertaining the Draft EIS, but if you have additional questions or additional comments, we will take those after the formal subsistence testimony.

If you haven't done so already, I would ask everyone to register at the front there on the signup sheet so that we will have a record of who's been here this evening. And also, you can request a copy of the Environmental Impact Statement if you don't have one already. And actually there are extra copies here this evening for those of you that don't have them.

Thank you again for attending this hearing. Is there anyone wishing to give formal subsistence testimony this evening. *<<Pause>>* I'm getting no responses for that specifically we will move on then for more general comments, but if anyone feels that they want to make a specific subsistence comment later

or if other people come in as were moving along, since it is still just a couple of minutes after 7, we will allow those people to do that.

Unidentified Speaker. <<*Not close to microphone*>> ...Jack Dupertuis has given me a statement for someone to read into the record.

Ann Archie. Can I read that? Would that be fine?

Tom Stewart. Yes, you can. If you do give...when you do come up to give your comment, if you could state your name and also spell it because someone will be transcribing this and they need to have that.

TTB-1

Ann Archie. This is Ann Archie. And I am reading a subsistence testimony from Jack Dupertuis who lives in Thorne Bay, Alaska and he writes: "To whom it may concern, I have a couple of concerns or problems with the road closures on Prince of Wales Island. Number 1 is the fact that water bars are so numerous that all the hunting pressure is being concentrated on a few main road systems. Last year I drove all the roads on the North Thorne system. I saw 26 or 28 does of which only 2 had fawns. I feel U.S. Fish and Wildlife and the U.S. Forest Service are causing a lot of damage to our deer herds by road closures. Reason being, all the bucks are being harvested so heavy that the does are not getting bred. Since deer won't travel any great distance to breed they simply are staying barren. Besides the deer problem I feel the road closures aren't fair to seniors and/or people with disabilities who want to see or hunt these areas like Honker Divide and Cutthroat. I especially resent being fined for driving on roads that my tax dollars built and that I own just as much as anyone else. This policy lets only a select few use these areas. I feel these are very bad policies and should be changed as soon as possible and roads reopened. Jack Dupertuis, Thorne Bay, Alaska."

Tom Stewart. Thank you. I'll just ask one more time if there is anyone that wants to make subsistence comments. Okay, there is still no response. So I would ask anyone who wants to make more general comments about the Environmental Impact Statement or on general issues related to the project to come forward and state your views.

Unidentified Speaker. I've got a question. If you guys are going to close all these roads, than why not make it closed to everybody, and that includes Forest Service personnel, Wildlife Enforcement, everybody! Why not?

Ann Archie. Some of the reasons that we keep the roads open are to have timber sales flown between timber sales behind those road closures..???. We use law enforcement people to go back there when they see traps that need....

Unidentified Speaker. Why can't they walk like everybody else?

Ann Archie. That's a good question. But, at this point, they use the vehicles to go in and find people, oftentimes there are protection measures they need to take. So, that's the reason that the law enforcement people go in there. Behind the closed roads on Cutthroat, KPC operates a radio transmitter station with propane tanks that they need to have filled, so we have to get the

TTB-1 Comment noted. Please refer to response to CLCC-9 in Appendix B.

propane truck in there to fill those tanks. So KPC goes in there. We are also allowing KPC to go back to take stream temperature readings so that they can do there research. So there are people that we permit to go behind those road closed signs for those reasons.

TTB-2 **Kathy Lietz.** My name is Kathy Lietz. I'm a resident of Thorne Bay. Eight years now. I specifically would like to address the Control Lake EIS and that I firmly support Alternative 8. It seems to be reasonable compromise for both parties. It meets the purpose and need. I followed this from the scoping process and the purpose and the need was 187 million board feet and I think Alternative 8 pretty much captures a lot of the concern from the scoping process. It stays out of the Elevenmile area as much as possible. It gives a nice wide berth to the Honker Divide area which has come under so much consideration. Takes into consideration a lot of the concerns that people have voiced throughout the process and at the same time allows for a reasonable amount timber harvest and provides jobs, economic stability, and infrastructure to the communities on Prince of Wales Island. I definitely, again, support Alternative 8. I would like to say, I vehemently am against Alternative 10. While I understand the need for small timber operators, I think that by completely excluding Ketchikan Pulp Company, they are putting a whole lot more people out of work than the few might not get as much wood by going to a different alternative. And as for subsistence areas, my family hunts, fishes, traps almost exclusively within the Control Lake Project area and I think that subsistence and timber harvest can coexist and I don't see any reason why timber harvest in the Control Lake area is going to make a significant impact on our subsistence usage.

Tom Stewart. Thank you, very much. Is there anyone else that would like to speak?

TTB-3 **Brian Thompson.** Yes. My name is Brian Thompson. I also in favor of Alternative 8. Just far as the timber. It seems to use less acreage for the amount timber volume that is there, which in turn, means to me that timber is better than what is in 7 and it stays away from Elevenmile. Reasons the I think the low volume timber harvest to me offers better deer coverage and feeding area in the winter time other than some of the bigger stands. And will use less acreage anyway and give the deer a little bit more cover. So I'm in favor of Alternative 8. And as far as subsistence usage, I also hunt and fish a lot in the Control Lake area, in fact all over, I think timber harvest would even improve some of the deer hunting practices and also trapping. Thank you.

Tom Stewart. The time is now 7:10 and a group of people have just walked into the hearing, so I want to reiterate a few things. For those of you who have just come in, this is a formal subsistence hearing for the Control Lake project. And we have asked people for formal subsistence testimony and there were not very many people that had comments, so....I'II start that over again, a couple of new people have just walked in. This is formal subsistence. A formal subsistence hearing for the Control Lake project and earlier, in the last few minutes, we have asked for solicited testimony on subsistence from people,

TTB 2 Comment noted.

TTB-3 Comment noted.

we did not have any subsistence comments directly or subsistence testimony so we moved on to general comments on the Environmental Impact Statement and general comments on issues associated with it. So now I would like to formally request if anybody who has just come in wants to make formal subsistence testimony, that they can come forward now and do so. If no one has formal testimony and then will go back to having the more general comments. So, I'll give people a moment to think about, as to if they do want to do that, since you just walked in. *<<Pause>>*

TTB-4 **Brian Thompson.** This is Brian Thompson. I'm resuming to make some comments. As far as road closure that have happened such as bridges being taken out of major streams, I think that there should be either bridges, small bridges replaced or sill logs be placed over the streams. Due to heavy rains that occur up here at times, you can walk into these areas at ankle-deep and come back to find a waist-deep creek and I think this should be addressed in the future. Also the main road systems to some of these areas that have been logged should be left opened with old spur roads dug up or non-driveable for deer hunting purposes.

Tom Stewart. Okay. Thank you. Now that everyone has had a chance to think about it. Is there anyone that would like to make formal subsistence testimony about the Control Lake project? *<<Pause>>* No one has indicated that they do want that, so we will switch back over to the more general comments, but you're welcome to make more general comments about subsistence while you're talking about other things or if you want to indicate a formal subsistence testimony, anybody can talk about that at any time. We're being formal in the sense of recording this, but we don't have to be formal in the logistics of who talks when. So, whoever would like to come up next and make a comment or a series of comments, you're welcome to do so. *<<Pause>>*

As I said the other night, I've got about 45 minutes of tape just on this one side, so you can listen to quite a few people if they want to talk. And we're going to listen to any comments that you might have whether they're very general or very specific. So don't be shy.

<<A few barely audible words from Unidentified Speaker in audience>>

Unidentified Speaker (female). Do we have any kind of data yet as to how timber harvest are affecting the goshawks.

Ann Archie. Nothing that has been published formally. The research has been going on. They are collecting information mainly on how goshawks use the forest. And if they use harvested lands or they use a mixture of harvested lands and unharvested lands. But the research is still ongoing so it hasn't come to any conclusion at all. I wish it would so that we could use it.

Tom Stewart. It has just been a few a minutes and so I hesitate on one hand to close the formal part of the hearing. But on the other hand, if people don't have any comments that they want to come up with than it maybe more effective to close the formal part and then maybe continue on with the workshop a little bit since there still some new people here. Is there anybody that

TTB-4 Comment noted.

would like to talk for the record?

TTB-5 **Unidentified Speaker.** I've got a few comments on Honker D. and Cutthroat. They are blocked off. We can't drive up them, we can walk them, but we can't drive in there. But at the same time, the Forest Service can drive their rigs up in there. And I don't think that is right. I think if we have to walk in there than they should have to walk in there too. Any rig, State, Forest, or whatever. If we're not allowed to be up in there with a rig, they shouldn't be allowed to be in there either. Being how...I just don't think it's right how they are running that. I mean the logging money and timber money is what put them roads in and then they turn around and tell us we can't drive in them, but we can walk in them, but they can drive their big rigs up in them.

Ann Archie. I can give you an answer because Ken (???) asked the same question. The Forest Service rigs that are going up there, one is law enforcement officer who is checking on weekly use of the area and needs to go up in a rig because oftentimes there he has had to take protective measures in there. The second thing, is that some of the rigs that have gone up are to plan future timber sales for CPOW timber-layout units that are connecting up in there and that is the shortest way to get up in there and then they park and walk up the timber-layout units, layout roads. I've given them, those employees, permission—they don't just drive up there because they want to—permission to go in there so they can get that timber sale layout done.

Up Cutthroat, we allow KPC, Jim Wilson's propane tank to go up there to fill the tanks for the radio site up there, so that the radio communications are okay with KPC. So we have allowed them to go up there, and also KPC employees who are doing the water monitoring up there, we've allowed them to go up there. So they're are times that we really do need to allow people to go up them in vehicles because it is the shortest, quickest way to get that work done. I don't know how else we would get the propane up there if we didn't take a truck up there. So, that's the reason that people are going up there.

Unidentified Speaker. Well, like on Honker D. what about the...there are people who take kayaks up there and drive around up there and bring them down to the lake. <<*mumbled words*>>

Ann Archie. I've never seen people or no one has ever come in and told me. If you would let me know, give me a phone call or tell Charlie or come to the office and say 'You know, somebody is up there right now. They're behind that sign.' We'll take care of that.

Unidentified Speaker. I've got a question. What's the purpose of shutting these roads off? What makes Honker D. or Cutthroat any more important to be shut off than Goose Creek, let's say?

Ann Archie. Those two roads were the compromise that was struck with the 89'- 94'timber sales. There was an appeal of the timber sale by SEACC and it was bringing it to a stop. And a compromise was reached. And the reason that, that this timber sale was at the appeal time was reached, brought to a stop <<*a lot of inaudible words*>> is because SEACC did not want timber harvest in the Honker Divide area more than Cutthroat. So the

TTB-5 Comment noted. See following response by Ann Archie.

compromise was struck. There will be timber harvest up there, but the roads would be closed afterwards. Sounded like a good deal. Everybody was kind of 'win-win.' The timber harvest was able to come out of the Honker area and out of the Cutthroat area, but once it was over then the roads were closed and it could be used again for recreation.

Unidentified Speaker. Okay, if that's the case, that's what, the scenario you were saying happened and it's true enough, okay. Why...for recreation, I'm a recreationally person too. Did anybody ever come to me and say hey...<<*jumbled, agitated wording here*>>>...that I didn't want...didn't want the road closed. I was the one that paid for that and that's my company, or whatever you want to call it, that we paid for that road to put it in there to be used, be able to use it. If you guys didn't want us in there, what do them people got a right to say to they got a right to shut it down? We should still have a right to be able to access that area. Because we did put the tax dollar in that area.

Ann Archie. <<*talking away from microphone*>>...so did I.

Unidentified Speaker. I know, that's what I'm saying. You, as a Forest Service person, you have. But then why shut the dang thing...why should it be shut down?

Ann Archie. That was the compromise that was reached in order to bring the timber out of there. In order for that timber to come out of that Honker Divide area, that Cutthroat area, ...for you to have a job and for people to log in there that was agreement that was reached. And that's all I can tell you.

Unidentified Speaker. <<*mumbled words*>>...come that point of an impasse in the first place when it was under the long-term timber sale to start with.

Ann Archie. Well, it could be appealed that the EIS was appealed. So in order to get that dead center and get logging going that was the agreement that was reached.

Unidentified Speaker (female). Was this after they started cutting or before they started cutting?

Ann Archie. Before.

Unidentified Speaker (female). 'Cause I, I was the one who went and I helped layout the units and that kind of stuff up on Honker D. And it just seems like normally you hear stuff about this before it happens or when its happening. And we never heard anything about that.

<<*More discussion back and forward about the closed road issue between unidentified speakers in the audience and Ann Archie.*>>

Unidentified Speaker. I have a question. Getting back to the Honker and the Cutthroat. Are there any numbers on how many people use that in the summer time? I mean, backpackers, hikers, bicyclists?

Ann Archie. No.

Unidentified Speaker. Other than, you know, the hunters, at all?

Ann Archie. No. We haven't kept any records about that.

Kathy Lietz. I have a question too...With going through the TLMP process and revisions and all of that. How are TLMP

guidelines—and we sat through the TLMP meeting and they mentioned that there would be a 2-tree-length buffer on classified streams, talking about areas 300 year rotation things like that—how is that going to specifically affect those TLMP guidelines ...???

Ann Archie. Well, I guess—I am going to answer this off the top of my head because I'm trying to figure out how to answer it—if TLMP comes out and gets through political water we have....decision over that issue. And if it comes out and it is applied ....probably the standards and guidelines in the TLMP will be applied to this. And I don't know what that will mean in terms of...how many units would fall out because we would be putting the larger buffers on them. We haven't done any of that kind of...

Kathy Lietz. So you would make up...we wouldn't...if we won out and got our Alternative 8 at 184 and the TLMP, like they took 20 of that, you wouldn't revise that map to make sure that we got are 8 and 184?

Ann Archie. We would have to look at what Alternative was chosen. Let's say Alternative 8 was chosen. And then TLMP was agreed to and implemented. So 180 million does go down to 160 million. Since that was the agreement that was reached under the contract with the public, if we wanted to add more timber into that and change it, we would have to go back through, what's called a supplement to this EIS, and we would have to show 'well, we can add this unit and this unit from Alternative 2...<<*mumbled words*>>...we'll pull this one in and this one in and this one in and it would have to go through the whole public input process again for comments and appeals.

Kathy Lietz. So what's kind of scary, is that, I think Alternative 8 is like, I agree with my counter parts here that it's like, I feel it's so far for everybody. But than maybe we should be greedy because Alternative 2 and get everything we can because you're going to take some of it away from us anyway. Then that would cut us right back down to 180. You know, I mean, so what do you do? Because, you know, I want to be fair, but yet I don't think the government is going treat me very fair, so you know, we are kind of between a rock and a hard spot.

Unidentified Speaker (female). I have another question on looking at the environmental consequences of the alternatives in the summary. It shows that on Alternative 1, 2, 7, 8, and 9 caves and significant karst features. And it says harvesting <<*loud noise interruption*>> zero...

Tom Stewart. Yeah.

Unidentified Speaker (female). Is it really possible that there are absolutely no caves near <<*loud noise interruption*>> in that area.

Ann Archie. We did...well, Tom can talk about this, what they did out in the field.

<<*Mumbled discussion between several different people*>>

Tom Stewart. There are units that have karst adjacent to them or in. Let me back up a step to what we did with field work. All of the potential units were investigated by a series of specialists, whether it was soils or fisheries, and also for karst features. So every unit was looked at at some level and if anybody saw anything that had any particular karst type features in it they would notify the

geologist who would go out there and look at that. Separately, the geologists also looked at the bedrock geology for the areas that would potentially have limestone and therefore karst, and they went out and looked at those specific areas and at the units that were within them to see if they had something. There were a variety of units that did have—that things were found either by the geologists or independently by the other specialist who then...the geologist went and looked and verified that there was something there. Then some of units were dropped because there was significant enough—it was very obvious that there would be an affect—and that we dropped them out or deferred them until there was more detailed investigation. Others, there was mitigation put in so that boundaries were changed or road locations were changed and on those there was also the request that during final layout a little more detailed investigation go on there. There has been a little bit of interim investigation of those sites. There is also the general karst vulnerability process which is going, which is more of a broad scale mapping and planning type procedure that uses all of the detail that can include in a little bit of field work, to try to figure where the most potentially affectable areas are. And that process is also being looked at and being reviewed in relationship to this EIS.

I believe that the table shows zero because we have mitigated them out, but when you read the other issue 7 on page 27 of the summary it does give some acres of areas that are around them. So there is some karst in the area. Another point to know about is that even though there is quite a bit less karst in the Control Lake project area—see compared to CPOW just because of the way the geology is—the geology in the Control Lake Project area instead of having big, broad bands of limestone which run for very long distances and therefore, have very broad areas of karst, here the limestone tends to be in isolated pockets or pods. So, its likely that we will find some more, perhaps in these areas or certainly other areas around them—but it is a little bit harder to find. And there are some nice things out there in those.

Unidentified Speaker. <<*interruption*>>...where its been logged and they been...the mines where them caves are at, how much detriment has been done by the logging down by them caves? <<*mumbled words*>> I've been there where those caves were found and I've logged that back in the '60s and it grows back up again. You guys are just finding them now. Its fair to say that there is very damn little detriment done to them caves as what we've done to be logged over them. So, what's the big point in taking away a big area of timber—to access to it—that isn't going to amount to a hill of beans in the realm of getting it logged or you people being able to use it as a...as a...as a...I got to admit that it's a good deal to have these tapes and be able to study them and people to be able to see them. But, I don't see where their taking away a hell of a lot of timber base for a...

Unidentified Speaker(female). <<*interruption*>> Hey!

Unidentified Speaker. ...relative small amount of return.

Unidentified Speaker (female). <<*interruption*>> for a cave over people needing it, having a home and all this, rather than taking away our timber for something...so they can learn something...it seems like, what the people that have been in the woods for fifty-some-odd years, what are they going to do because you guys want

to study a cave? I mean, it's kind of stupid, when you come to think of it and you wonder, my husband's been in the woods, and my dad, and my grandfather were in the woods, and you guys want to take away the trees—not let them cut down the trees for a cave you would like to study—my dad is really smart when it comes to this kind of stuff and I believe what he says that it is not harming a cave to cut down the trees around and I grew up around here seeing how you can't even tell the difference. The deer are there, the bulls are there, the goshawks they've been here and they're still going to be here, they can survive anything beyond death. And I think you guys really got to decide what is really more important, a cave, a deer, a wolf, over somebody surviving...being able to live.

Tom Stewart. The one thing that I'll say is that there is a law called the Cave Management Act which mandates that caves be searched for and managed and that's what we're doing.

Unidentified Speaker. I understand that having the access to that cave, I'm not denying that, but what gets to me is that they're putting too much into a—not too much into it, don't get me wrong—I think that this is not a bad thing and that's what I'm getting at. They are taking away way too much timber base—it's just like your, all your buffer zones—I like to have you guys go out there and turn around and look at what you have done to a fish stream totally asinine, leaving it stand there with a 200-foot buffer, only that a 90-mile an hour wind come down and totally wipe the whole damn thing out, then you got to come back and salvage it up. And then you won't do it until it damn near gone and wasted away to nothing and then go in and get. I mean, that to me is total waste. You talk about waste, that is one big thing—I've seen it, they've done it down south in Oregon country, in Washington and quit using buffer zones back in the '50s and then they come back to it again. It still doesn't do a damn thing! You're right back to where you were 50 years. And they got them wrong. But that's my opinion on it. I don't like a buffer, a creek, but buffer do not...<<*jumbled words*>>..that valuable of the stream. Take enough away from that stream so we can...<<*jumbled words*>>...You got to protect it to where it is going to be protected, from itself, and you're not doing that. You take it down, and cut it down to 60 foot on each side. Boy, you want to go out there on Goose Creek where I just got done cutting less to 2 years ago and look at what happened to it. I'll show you what happened to it. You had a creek with a 80-inch culvert that took the whole flow of that stream on a 8-inch ??? mine you—and you guys led a 200-foot buffer going under a creek that didn't amount...that...with no value. And here the timber is now—down and it's been down for 2 years, and I'll bet you another 5...it will down for another 5 and you still won't go log in it. And it will be just a waste.

Unidentified Speaker. But then you guys hire people to go in after you put these 200-foot buffer zones on here you guys go and hire people to go cut down some of the trees to lay them in the creek so that the fish will have something like a fish ladder to get up. Why didn't you start doing that—have them fall a couple of trees in there to begin with—so you don't have spend the federal money to go out and hire somebody to go and cut these trees so the fish will have a ladder. Why not keep the trees in there instead of going and building one of those clang fish ladder up there—I can understand some of it, but here we are salvaging...I've seen 200-foot buffer

zone...I've worked with the Forest Service for one summer...I've seen them put a 200-foot buffer on a creek that was only that big. And then you have your, "You can't log past here. And you can't past here." Because, "oh, those are saved, we have to save those." And it is getting down the point that we are going to have less and less land that we can save and then what is everybody going to do? I'd like that answered. What are we going to do when you guys set down all the wood or keep putting these buffer zones on for these little creeks. What land are we going to have? It's not like it's almost gone, but if start closing it...I have a question, didn't they close some of their land already for the goshawks, haven't they in Alaska?

Unidentified Speaker. Not law yet.

Unidentified Speaker. On the island? I heard they shut down some land for the goshawk.

Ann Archie. What has happened is that there are large blocks of old growth, like the Honker area, and over there in the Elevenmile area, and up some areas in Wild Bay country that in this point in time are being deferred. Like some of the CPOW units that are in those areas. We're not going to offer those at this time. We're going to wait for TLMP to come out. Some of the options—or the alternatives—in TLMP so different amounts of these old growth areas to be left, some are where there are a lot of old growth in some of the alternatives, and some of the alternatives have less old growth. And so in order for us to have the option to implement any of those alternatives at this time, we are not going to harvest those units. So once that decision is made and we know how much of these old growth blocks we are going to save for wildlife, then we can go back in and harvest those units or we'll not harvest those units depending on what's chosen.

Unidentified Speaker. Okay. Why not harvest those units since we don't know anything about the goshawk? Why not just harvest some now because we don't know what the goshawk can...we know that they're...that they've done good...so far we haven't had a decline, have we, in goshawk life—or however you word that—yet have we? Since we just started this research there haven't been where we came up with, "Okay, we cut down these trees and we have a shortage of goshawks there because the trees are cut down." We have hardly any information on it so what not just go ahead, go ahead with the process?

Ann Archie. There isn't information like what you just specifically said, you know all that, if you have a goshawk and in certain areas they are living there and you go cut down trees—what that affect of cutting down those trees is on the goshawk. You're right, we don't have information on that. But the information that we do have shows that goshawks here die at real high...there is a real high mortality rate for goshawks. And that isn't known yet as to what causing that, whether that is a loss of habitat from logging or they're at the fringe of their range maybe that has something to do with it too. But at this time, what has been decided is to keep those areas intact until TLMP comes out to make the decision to what to do with those lands. And TLMP will use the best information we have at the time about goshawks. And once the Regional Forestry makes that decision, then we can see what units in CPOW or these other timber sales will be available for harvest. And there may not be any or some of them or maybe all of them will be, depending on

what decision comes out of TLMP.

Unidentified Speaker. So basically it's like the Spotted Owl. They're almost extinct. They cut everything down and then they come back 5 years later to find out that they screwed up and there are some many of them around...<<*noise interruption*>>

Charlie Streuli. If I could address some of the comments, too. I respect Hank's knowledge, you know, he's been in the woods a long time, he has a lot of natural resources. I just kind of relate to him, in 1988, you know, they passed the Cave Resource Protection Act. And it basically says all caves are significant until proven otherwise. And that's a federal law. It's kind of like laws about archaeology and cultural resources. And maybe we don't really know what's going on, how timber...how it affects the caves, but we know that their very sensitive to what you do on top of the ground if you change that water pattern it could change the caves. And I don't know of any studies that we're doing, but we're trying to go through that and learn and also, you know, keep people working and things like that. In the Lab Bay Timber Sale, I think we been lots of different compromises with the karst, you know at one time, I really didn't think that...I thought Lab Bay Timber Sale there would be no harvest at all anymore in Lab Bay. I owe some of that to Jim Baichtal; you know, I think he worked really hard and so did Ann on identifying high, medium, and low concern for karst. We identified the high concern and we kind of put that aside and we're still working with the low and medium but at one time, I kind of thought, well, that might be the Spotted Owl. Even before that though, what we were really dealing with was the goshawks. A couple of groups petitioned the U.S. Fish and Wildlife Service to list the goshawk and the wolf as a threatened or endangered species. That was kind of like the train heading down the track to a big wreck because we were going to go the same way that Region 6—or Oregon and Washington—did with the Spotted Owl. And we didn't want that to happen. And Ann actually took the lead on that for the whole region on writing some guidelines on how to manage—you know, they have a nest areas then they have a forage area—or a fledgling area—then a big foraging area where they go and get their food. We put some guidelines, and I think we used 30 acres at the time for a nest, and there were some different restrictions. I think we worked through that, we deferred a couple of units but we've been kind of working through that and what we did, Fish and Game with U.S. Forest Service, collared wolves and we did the wolf study and we put telemetry—those little radio collar pacts—on goshawks and they've been flying around and checking them. Anyway, we've been trying to work through these processes, these different things because you know, we have the long-term sale contract obligation, we have an obligation to...we have some obligation for something for people working in the woods. I think the forest is a place that supports the lives of everybody. I think they've been that way since people began. So we get everything from the forest, and we're trying to keep it so that there a flow of timber, there's things for tourists, there's caves and all those kinds of things. And we've been kind of walking a tight rope trying to do this balance. And on the road closures some of the other reasons, I was thinking about...

<<*side one tape ended*>>

Charlie Streuli. <<*beginning of side 2 cut off some words*>>...I really do, you know. We've been working pretty hard at trying to keep things going. I mean, we get lawsuits, we get appeals, that's kind of a part of life, but we've been trying to work through them. But on road closures, anyway. There's a deal...I call it a wildlife model...but more or less like people in Fish and Game, they come up with these ideas—and with lots of experience and stuff—and kind of get a handle on the deer population, the wolf population, the bear population in these WAAS, you know, these Wildlife Analysis Areas, that when you get a hunter survey they give you a map and say, "Where did you hunt?" You know, and this. And you don't have to say, this road or this area, just identify this 4-number, 1423 or something. And then they figure out how many deer have been harvested. Maybe they throw a little factor on for poaching or something or whatever they do. And then they say there's this many deer and you can harvest 10 percent of the deer population, you can harvest 7 percent of bear population, to keep that population sustainable. But when they see more than that 7 percent or 10 percent of the population being harvested, it kind of throws up a flag and instead saying let's reduce the season or the bag limit, they want us, you know, to limit access. Same thing for marten really not beaver—but marten and wolf, you know, is what they're concerned about. And then they started saying, you know, we need roads closed in these areas. So we are trying maintain the populations—healthy— you know, for subsistence and that kind of thing.

<<*Barely audible response from unidentified speaker in audience. Several people speaking at once.*> >

Unidentified Speaker. <<*speaking far away from the microphone, barely audible at times*>> I can't understand their reasoning for ???? doe seasons. I just tried called....and get some...they never took a study on them as far as I could see...if they was going to do this, and you look at it in a realistic way, our deer has migrated into heart of this island greatly in the last few years on a count of that we've had mild winters. We're looking at a hard winter coming up maybe—I ain't saying it is going be, but we've got a damn good chance of having one. We would've been better off if we would have took and said, hey any deer...<<*jumbled words*>>...you want to shoot does it's got to be a least 5 miles away from the saltwater. That's where you lose your deer at, and we're going to lose it big time there. So if you think these deers...there is going to be a percentage of them deers start migrating down to your low country...if you knock them deer in the head up here in the high country, you're staking your rural habitat for the deer that are already there and you'll have a place for them to survive. If you don't do that...to me that would have been a better alternative. Nobody looked into it and said...<<*jumbled words*>>...we got too damn many. We do, I'll agree to that to a point. But, we should've...I've seen this island and the interior of this island where there... 18 mile...out by Halfway House and in there where you couldn't shake the deer loose if you wanted to ten years ago. Now the deer been in there because we've had mild winters, they migrate back into them areas and they'll winter in them areas because they can survive through that winters. And they set themselves up for a big winter kill. That's why I think we're hurting. We should've said, "hey, leave these deer alone down here because that will be our group (??) stock and away from the low lands." I don't know,

that's just a thought. I'm just crowing at you guys because it's something I think you got a little bit...you got control over it and can say "hey, you can put it ????" You can't shoot a doe within 5 mile a piece on the ????. I know a lot of people aren't going to do it and a lot people shoot does anyway, you're going lose that percentage of does that why...<<*jumbled words*>> ...Because if somebody going to come out here from town and he wants deer meat he's going shoot a doe, you ain't going to stop him and I ain't going to stop him. But you can...so that's why I didn't think we needed a doe season, because there's going to be that percentage of killing.

Unidentified Speaker. I didn't think we needed a doe seasons either really. When we called up there and talked, it really blew me away for the reason for why they opened up a doe season. Because 3 people called in there, up to Anchorage, 2 people, I think, were from Walter or Craig, and...<<*interruption*>>

Unidentified Speaker. It was a few number...

Unidentified Speaker. ...and there was just like 3 people called in and said there was too many deers and it's getting hard to find the bucks so that maybe we should have a doe season and that's what the guy that we talked said they based it on—those 3 people that called.

Charlie Streuli. I think what they might referring to—about those 3 people as I understand it, now Sherie Porter she was here—I'm kind of giving this to you third hand, and I don't know how accurate I am—Sherie can give it to you first hand. But, as I understand it there is a like Fish and Game or Subsistence Advisory Board on the island and it consists of 3 people and that could be the 3 people they're referring to. And they recommended a doe hunt and some of the reasons they said it was a traditional, cultural type of hunt because they said they didn't want to shoot bucks in the rut so they would shoot does. Because they didn't want to eat bucks in the rut. So that's why they shoot does, and it was traditional and they wanted to do it again. I know the federal is in charge of subsistence now, but the attitude that I've heard the Board takes is not to overturn a local recommendation unless, you know, there's some substantial reason not to do that. You know, say we have proof that...some kind of proof that that's not the thing to do. And the Forest Service did recommend, as I understand it from Sherie, not to have that doe hunt, and the federal subsistence board in Anchorage said "We understand what the Forest Service said, but we're going to go with the local subsistence board and have that doe hunt." And that's how that thing came about.

<<*Response from unidentified speaker in audience away from the microphone*>>

Unidentified Speaker. I realized that events can change this, but roughly when do you expect a final decision.

Ann Archie. Well, with everybody ???? all the political ??? water, I was thinking about a year...with TLMP coming on board...I have no idea how that is going to affect this. I know Sen. Stevens has got a couple things out-going. He's got...there's some bill that's been introduced in the—is it the House or the Senate—I think it's called the Farm Bill. I don't know if you've heard about that where he...it's the Senate...where he's asked that there be no Land

Management Plans that address viable species or habitat for that. If that passes that could changes this or if that is taken to court—and we all know everything that he does—it will be taken to court and everything. Somebody else will be taken to court.

<<Comment from identified speaker in audience away from microphone>>

Ann Archie. Oh yeah. I probably...this will be appealed, I think we already know that, one side or the other depending on what happens.

Unidentified Speaker. In lieu of that, what else does Forest Service have to obligate timber to makeup for the long-term timber sales tracts...*<<noise interruption>>*

Ann Archie. There're still more units on CPOW coming out, some in March and some in September. And then you have Lab Bay timber sale which will be coming on board.

<<Discussion back and forth with Ann Archie and three or four unidentified speaker about various timber sales in different areas.>>

Charlie Streuli. '96 is a...it has...and the Forest Service has given the KPC the Action Plan for '96. Bushington Point on the Thorne Bay district, it would be North Thorne, Little Grass, those Twin Spurs, Standing Winter Harper, Knox, that one there. '97 is were these would come into play. And there might be some slack like on the Ketchikan District, Bushington Point, up in those areas...

Unidentified Speaker. What do you expect the volume to the pulp mill to be?

Charlie Streuli. I would give you the political answer. 190, 187, whatever has been historical.

Unidentified Speaker. Okay.

Unidentified Speaker. It seems to me like groups such as SEACC just to mention one thing, because I know they're behind the bottom appeals, these timber sales, kind of want to have their cake and eat it too. A lot of pressure is being put on Prince of Wales Island right now because of the appeals up north. Now when APC shutdown and their contract was taken away, you had 2 mills that you had to service you know, you had a contractual agreement with 2 pulp mills that had to be serviced—you had so much volume that was coming out. One mill is gone. I mean common sense dictates that you can take the whole area now, meet the contractual agreement for one mill, split everything there and take the pressure off everything. I know we aren't going to answer the question to that here tonight, but...

Ann Archie. Well, there is some information on that. What is common sense to us, is not common sense to lawyers. And what happened KPC that they say that timber up on those northern areas does not meet the contractual requirements. And so, our lawyers are trying to figure out if their right or not or if this is all...and, you know, try to avoid a lawsuit. We can't talk all that much about it, but that...those are some of the issues that revolve...<<interruption>>

Unidentified Speaker. KPC said the timber doesn't meet the contractual agreement.

Charlie Streuli. You're referring to the lawsuit....the Alaska...

<<Several unidentified speaker talking at the same time>>

Unidentified Speaker. ...I know there were a couple ElSs up there that were challenged.

Charlie Streuli. What we tried to do...we have tried to do just what you said and offer those sales and then you're right it got held up in court and that's been...*<<interruption>>*

Unidentified Speaker. Been held up in court by KPC ???

Ann Archie. No. But some of the...you know, we can't talk too much about the lawsuit, but some of the statements is that KPC's stance is that "yes, we will take that timber, but it does not meet the contractual requirements or the Ketchikan Pulp Company Long-Term Contract. You can give us that timber, but you still have to meet your long-term contract requirement—you, the Forest Service—has to meet it down here."

Unidentified Speaker. Thank you, I was not aware of that. *<<interruption>>*

Unidentified Speaker. How many...because...I don't know if we're all aware yet that we've gone back over the goshawk issue there and they're now appealing the decision not to let the goshawk...*<<noise interruption>>*...we're into a lawsuit now, where they're trying to force the goshawk to be listed as a threatened or endangered species. So that's got a real potential impact here. How many...can you give me even a rough guess...how many goshawks nests are in the Control Lake area? Even a rough guess.

Tom Stewart. One for sure that I know of.

Ann Archie. One...one.

Unidentified Speaker. Where are they located at?

Tom Stewart. In the Control Lake area.

Ann Archie. Yeah, there's one that we know of. You know, an interesting...it's an interesting game that gets played, the steps, in terms of this, because when the petition was made to list the goshawk and wolf, the Forest Service reacted...the Fish and Wildlife Service was finally reasoned to list...the Forest Service then responded by putting—what we all heard a year ago, the HCAs—and then the Fish and Wildlife Service says with those areas in place until the duration, until the TLMP comes out, we won't list. So that logging continues. Now that the lawsuit come and go, that's a whole different creature. Because if those of you who were in Oregon or Washington remember this same thing happened down south. That there was petitions to list the Spotted Owl, the Fish and Wildlife Service said no, it would be listed. The Forest Service did some action to tried to save habitat, then the lawsuit happened, and the judge ruled that it should be listed. And what we're hoping is that the actions taken by the Forest Service to defer—these large blocks of old growth—will convince the judge that, yes we are taking measures and we are studying goshawk and that TLMP will make a good decision about goshawk habitat so there is no need to list. Because if it lifts, what will happened in Oregon and Washington...*<<interruption>>*

<<There continues to be approximately 20 to 30 minutes of back and forth discussion between TS, Ann Archie, and unidentified audience members on related subsistence, road closures, hunting, timber sale, and other EIS-related issues.>>

Tom Stewart. I'm going to make a statement here. I'm not trying to get people to leave or anything. Because this is a formal hearing and we've been recording this, and it is supposed to be transcribed, the reality is that when it breaks down into a general discussion there is no way that a transcriber can pick everybody different voice out and keep that whole conversion going and distinguish what's going on. Especially because people are talking at the same time. So I what want to make here is a general statement that we had the formal subsistence hearing and we had formal comments from people and then the group broke into a more general discussion of the various issues and topics and brought out a series of concerns and asked a series of questions. And varying levels of answers were given depending on individual's knowledge...the people that were here. With that statement, I would like to ask is that is there everybody want to make a formal subsistence statement or another more formal comment where they would come up and say something specific. If no one does, then what I'll do is say that we are going to formally close it and I'll turn off the tape recorder, but we can stay and talk as long as people are interested. So is anyone interested in coming up with a formal subsistence statement or a formal comment on the draft EIS? <<*pause*>> There's been no response so the time is at 8:20 and I'm going close the formal part of the hearing.

ANILCA Section 810 Subsistence Hearing Testimony
Control Lake Draft EIS
COFFMAN COVE, ALASKA
December 7, 1995

Tom Stewart. Good evening. I want to welcome everyone here tonight. My name is Tom Stewart and I'm the...I work with Foster Wheeler Environmental Corporation who wrote the Control Lake Environmental Impact Statement. This is the public hearing for the ANILCA Section 810 for Subsistence for the Control Lake Draft EIS for the Ketchikan Pulp Company Long-term Sale Contract and the Ketchikan area independent sale program.

I am going serve as the designated hearing officer for tonight's proceedings. We will be taking formal testimony and recording it and we will also be taking written comments if you wish to provide them or you may also provide written comments to the Forest Supervisor's Office if you want to do that and take a little more time on it.

For the record, today is Thursday, December 7 at 7:20 pm. This hearing is being held at the City Hall in Coffman Cove, Alaska. The purpose of this hearing is to get your views on how the alternatives proposed for the project may effect your subsistence use on the Tongass National Forest. Other comments about the project will also be accepted. The hearing is scheduled to last...was scheduled from 7 to 8:30. We will stay here as long...as it is necessary for people to make comments or subsistence comments this evening. What I would like to do is because this is a formal subsistence hearing, if people have subsistence comments that we make those first and the people come up or I'll hand the microphone to people and they could give their name, spell it. This will be transcribed so will needed to be clear so that the transcriber can understand everything. Once we have formal subsistence comments, then we will moved more general comments about the Environmental Impact Statement. And also answer questions. Hopefully, everyone has signed in, that they came in this evening. Because we would like to have people on the mailing list if they are not already. And we have already mentioned that copies of the EIS are available here tonight. So, once again I would like to thank you for attending the hearing and then ask if there is anyone who would like to make formal subsistence testimony about the EIS.

Unidentified. We have testimony but it doesn't really concern subsistence comments.

Tom Stewart. Okay. If it is general you should probably make that as a general comment.

Unidentified. Okay.

Tom Stewart. Alright there seems to be no specific comments for the subsistence part of the hearing. So now I would like to open it up to the more general comments. And anyone who like to make comments is welcome to do so.

TCC-1 **Jay Kilanowski.** This is Jay Kilanowski. I live here at Coffman Cove. Work for Ketchikan Pulp Company. And I believe that Alternative 2 is the best for the company with 230 million plus board feet. And I don't believe that any logging or any of that would hurt deer hunting, fishing. Hasn't in the past-shouldn't in the future. If for some reason they don't go with 2, I would say 7 would be the best alternative for Coffman Cove because that still provides as much volume coming to Coffman Cove, 25 million or so, coming to Coffman, and the other alternatives that you show there—8 is strangled Coffman with down to l 2 million and 9 is cutting its throat with down to 7 million. So I would say those two should be out of the question...we're talking about subsistence here...and we are trying to keep a community living. And those would put it out of existence. And that's all I need to say. Well, one more thing, as far as your closing roads or opening roads. I personally don't care one way or the other if your wildlife biologists feel that its more beneficial to the wildlife to close a road after you harvested it, if that still gets us in there harvesting it that's fine, I'll walk that road after...it's still going to let me hunt it. So I don't care one way or the other if you close it or not.

Tom Stewart. Thank you. Would anyone else like to make some comments?

TCC-2 **Frank Weatherby.** This is Frank Weatherby, I'm a resident here in Coffman Cove. Have been for about 9 years and I feel that Alternative 2 would be the best for this community and for the future of the company. And also on the roads, I kind of feel it is up to you. If you want close the roads, you know, go ahead and water bar them like you have in the past, but don't put a gate up or something and say that people can't go in if they want to walk. As long as they are open for public use. Just don't shut it off completely. And if Alternative 2 doesn't fly, then probably Alternative 7 would be best for this community. I think that it is important for this community to have the timber base coming in here because of the new land sales and the interest in this area for building and expanding. And that's about all I have.

TCC-3 **Joe Stecklein.** My name is Joe Stecklein. I'm a resident of Coffman Cove. I've been here for 6 years and I left Oregon because of the Spotted Owl. There is no timber harvest down there. I really believe that Alternative 2 is in best interest of the community and the company. And as far as the road closures, I think they should be close if there is a necessary reason for it, as long as they're not gated like Mr. Weatherby said.

Tom Stewart. Thank you very much for your comments. Is there anyone else who would like to make a general comment or again I'll ask specifically if anyone wants to make a formal subsistence use testimony about the project area and its alternatives?

For the record here, a new person has just walked in and I'll explain to the person what has just occurred. This evening we had a open house to describe the alternatives and people looked at those and asked various questions. A little while we opened up the formal subsistence testimony. We are taking both formal subsistence testimony and general comments on the EIS and how it effects the community or any other comments people are interested in saying. So, I realize that you just come in, but if

TCC-1 Comment noted. Alternatives 2 and 7 have been deleted from detailed consideration in the SDEIS because they are strongly inconsistent with the 1997 TLMP Revision.

TCC-2 See response to TCC-l.

TCC-3 See response to TCC-1.

you either of those kinds of comments then...what I would like, if you do speak to say your name and spell it so that it can be transcribed.

TCC-4 **Elaine Price.** My name is Elaine Price from Coffman Cove. And I support Alternative 2 it has the most allowable timber sale and also the most roads. Our community needs to have the economic diversity for Coffman Cove. And that provides ample timber that can be divided up between LP having the bulk and still enough for the independent timber operators. Is that good enough?

Tom Stewart. Sure, that's fine. *<<talking to Ms. Price away from microphone...not able to understand>>*

Elaine Price. I can't really represent the whole community because I don't know how they feel. But as far as the City of Coffman Cove goes, Altemative 2 or I think it is Altemative 3 has 187 million board feet, those are the 2 best options for our community because they will impact our community the most. We are mostly logging dependent. That is what a lot of are residents are involved in and <<discussion between Ms. Price and Tom Stewart and another speaker about discrepancy in the correct number Altemative she was referring to>>

2 Unidentified Speakers. 2 and 7 are the best for Coffman. 2 and 7.

Elaine Price. Is that the 187 million board feet?

Weatherby. Yes. It was exactly 180, but 25 comes to Coffman.

Elaine Price. Good. Wonderful.

Weatherby. You know, like I said before down 8 or down to 12 million coming to Coffman and 9 are down to 7 million to Coffman. For a 3-year plan that's pretty...

Elaine Price. That's not much. No, we really need the one with the best impact on Coffman Cove. And as far as closing off the Honker Divide in the Elevenmile area, I don't really know where the Elevenmile area is at, but as far as the Honker Divide area goes. I've lived here for 16 years and I've never really gone up through Honker Divide. Where if you build roads up there, I might have the opportunity to see it.

Unidentified Speaker. I think Elevenmile comes up through Winter Harbor.

Weatherby (??). That's another thing about Honker Divide that I talked to some of the people that have been through there on the canoe trips and from everything I've heard, I think it's a joke.

Elaine Price. Yeah.

Weatherby. I means its like, you gotta carry your boat half way and everyone I've talked to that has made the trip will never do it again.

Elaine Price. Right. It's a one time thing. I can barely.....

Weatherby. And it's not....

Unidentified Speaker. Well, you know it is for the wealthy and the healthy. And I think you should opening up these roads and

TCC-4 See response to TCC-1.

not only get the timber sale that you have there, but punch in an access to the lake so that anybody can go to it. The older folks, people with their kids, whoever, can go to the lake and enjoy the lake. Not just have it for somebody that has the time and money to go and spend a month canoeing.

Frank Weatherby. Well also, the timber is so far away that from anything that it would hurt...

Elaine Price. Right.

Frank Weatherby. in that area. That area were the rivers and the lakes are, the timber is so far away from it, it wouldn't hurt a thing.

Elaine Price. Well, they've got a policy that don't go near the lakes and rivers anymore, and I think that's wrong because otherwise it just makes where young people can go in with a backpack. These loggers and myself, you have one day a week, maybe, and got the wife, the kids, the ice chest, the dog, you don't want to pack in a half mile or a mile you just want to go somewhere and park, have a nice afternoon, pick up your mess and go home. You aren't into these great big....it was nice when I was young, but I'm not young anymore and I don't want to do that.

Unidentified Speaker. Go out with your Winnebago.

<<Laughing>>

Elaine Price. Or a van will do.

Tom Stewart. Well, I'm going to...because we are having a more general discussion and a general discussion is not something the transcriber can follow because of the individuals talking and the different voices. What I would like to do is to close the formal hearing and then we can continue the general discussion and comments and then certainly written comments, either this evening on the pads or if you want to send something, the comment period closes I think officially December 26 so we still have a few weeks here, at least more than 2 weeks. So the time is 7:32 and I am going to formally close...well, I'll ask one more time if anyone has any formal subsistence testimony to make just to be certain...and since there isn't I will formally close the hearing at 7:32.

Unidentified Speaker. Does this concern the doe hunt?

Tom Stewart. No, this doesn't concern the doe hunt specifically. That's a state regulation.

I would like to thank everyone for coming this evening. I know everyone has a busy schedule and the weather hasn't been so great lately, so thanks very much for coming.

End of Hearing

Appendix C

Mitigation Measures by Harvest Unit

Control Lake Project

Mitigation Measures by Harvest Unit

	Alt. 10	Alt. 11	Alt. 12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
574-401	0	0	0		1					1	1		1		1			1								1	1					1	
574-403	0	0	0			1				1	1		1		1						1					1						1	
574-404	0	0	0			1				1	1		1		1						1					1						1	
574-405	0	0	0			1		1					1		1		1				1					1						1	
574-406	0	0	0							1			1		1					1						1						1	
574-407	0	0	0							1	1		1		1			1								1						1	
574-408	0	0	0								1		1		1		1			1						1						1	
574-409	0	0	0							1	1		1		1			1		1						1	1					1	
574-413	0	0	0							1			1		1						1					1						1	
574-414	0	0	0															1	1							1			1			1	
574-415	0	0	0							1	1		1		1				1		1					1						1	
574-416	0	0	0							1			1		1				1							1	1					1	
574-417	0	0	0							1			1		1			1			1					1						1	
574-420	0	0	0							1			1					1			1					1						1	
574-421	0	0	0							1	1		1		1			1								1	1					1	
574-422	0	0	0										1		1			1								1			1	1		1	
574-424	0	0	0							1			1		1			1	1							1						1	
574-425	0	0	0			1				1		1	1		1			1								1						1	
574-426	0	0	0							1	1		1		1			1			1					1						1	
574-427	0	0	0							1	1		1					1								1			1	1		1	
574-428	0	0	0							1	1		1					1								1	1					1	
574-429	0	0	0			1				1			1		1		1				1					1			1			1	
574-431	0	0	0							1			1		1		1				1					1						1	
574-434	0	0	0			1				1	1		1		1						1					1						1	
574-435	0	0	0							1	1	1	1		1		1				1					1			1			1	
574-436	0	0	0			1				1	1	1	1		1						1					1			1			1	
574-437	0	0	0							1	1		1		1						1					1			1			1	
574-440	0	0	0			1				1			1		1			1								1						1	
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574-442	0	0	0			1				1			1		1		1			1						1						1	
574-443	0	0	1			1					1		1		1			1			1					1						1	
574-444	0	0	0			1	1	1	1	1	1	1	1			1		1								1			1	1		1	

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				Mitigation Measures by Harvest Unit																														
	Alt.	Alt.	Alt.																															
	10	11	12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
575-403	0	0	1			1							1					1								1						1	
575-404	0	0	1								1	1	1				1		1	1						1						1	
575-406	0	0	0							1	1		1		1						1					1						1	
575-407	0	0	0			1		1	1	1			1		1					1						1						1	
575-408	0	0	1						1		1		1		1		1			1						1						1	
575-409	0	0	1			1					1										1				1	1			1			1	
575-410	0	0	1							1	1		1				1			1						1						1	
575-411	0	1	1					1			1		1							1						1						1	
575-412	0	0	1								1		1							1						1						1	
575-413	0	0	1							1	1		1		1			1								1						1	
575-414	0	0	0							1			1		1					1						1						1	
575-415	0	0	0			1		1		1			1							1						1						1	
575-417	0	0	0						1				1				1	1								1						1	
575-418	0	0	1										1		1			1			1					1						1	
575-419	0	1	1					1	1		1		1								1					1						1	
575-420	0	1	1															1			1					1			1	1		1	
575-421	0	0	0					1		1	1		1					1		1						1			1			1	
575-422	0	0	0						1		1		1					1								1			1			1	
575-423	0	0	0							1			1		1		1	1								1			1			1	
575-424	0	1	1								1		1					1			1					1						1	
575-425	0	1	1								1		1					1		1						1			1	1		1	
575-428	0	0	0							1								1								1				1		1	
575-429	0	0	0			1					1	1						1	1							1				1		1	
575-430	0	0	0					1		1		1	1						1							1			1			1	
575-432	0	0	0						1	1			1				1	1								1						1	
575-433	0	0	0								1		1					1								1				1		1	
575-436	0	0	0						1	1	1		1					1								1	1		1	1	1	1	
575-437	0	0	0						1	1	1		1		1			1								1	1					1	
575-438	0	0	0							1			1							1						1						1	
575-439	0	0	0			1		1		1			1		1					1						1			1			1	
576-401	0	0	0						1		1		1								1					1	1					1	
576-402	0	0	0			1				1	1		1				1				1					1						1	

Control Lake Project

Mitigation Measures by Harvest Unit

	Alt. 10	Alt. 11	Alt. 12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
576-405	0	0	0			1				1	1	1	1		1		1				1					1						1	
576-409	0	0	0							1			1					1								1						1	
576-410	0	0	0			1	1											1								1						1	
576-411	0	0	0						1	1	1		1					1						1		1						1	
576-413	0	0	0						1	1			1		1			1								1						1	
576-414	0	0	0							1			1					1								1						1	
576-415	0	0	0							1			1		1				1		1					1	1					1	
576-416	0	0	0							1	1	1	1		1					1						1						1	
576-417	0	0	0							1			1		1			1	1		1			1		1						1	
576-418	0	0	0							1			1		1		1			1						1				1		1	
576-419	0	0	0							1			1								1					1						1	
576-420	0	0	0							1			1					1			1					1						1	
576-422	0	0	0										1					1		1						1						1	
576-423	0	0	0								1		1					1		1						1						1	
576-424	0	0	0							1	1		1							1						1						1	
576-425	0	0	0							1					1					1				1		1						1	
576-427	0	0	0					1		1	1	1	1					1							1	1						1	
576-429	0	0	0						1				1						1							1						1	
576-431	0	0	0				1	1		1	1		1					1								1						1	
576-432	0	0	0					1		1	1		1					1		1						1						1	
576-433	0	0	0					1		1	1		1					1		1						1						1	
576-434	0	0	0					1		1	1		1					1		1						1						1	
577-404	0	0	0			1		1	1	1	1				1						1					1						1	
577-405	0	0	0			1		1	1	1	1										1					1						1	
577-406	0	0	0			1		1	1	1	1										1					1	1					1	
577-407	0	0	0																														
577-408	0	0	0			1					1										1					1						1	
577-409	0	0	0			1					1				1						1					1						1	
577-410	0	0	0			1	1										1				1					1						1	
577-411	0	0	0			1	1			1									1							1						1	
577-412	0	0	0			1					1		1						1		1					1	1					1	
577-413	0	0	0							1					1						1					1						1	

Control Lake Project

Mitigation Measures by Harvest Unit

	Alt. 10	Alt. 11	Alt. 12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
577-414	0	0	0								1		1								1					1						1	
577-415	0	0	0								1		1		1						1					1						1	
577-416	0	1	1							1			1		1			1								1						1	
577-417	0	1	1							1			1		1			1								1						1	
577-418	0	1	1							1			1		1			1							1	1	1					1	
577-423	0	1	1							1					1			1			1				1	1						1	
577-425	0	0	0							1	1		1		1			1			1					1						1	
577-426	0	0	1								1		1		1		1				1					1						1	
577-428	0	0	0										1				1				1					1						1	
577-429	0	0	0							1			1		1			1								1	1					1	
577-430	0	0	1						1	1			1		1					1						1						1	
577-431	0	1	1			1			1				1				1				1					1						1	
577-432	0	1	1							1			1					1								1						1	
577-434	0	0	0							1			1		1						1					1						1	
577-435	0	0	0							1	1		1					1			1					1						1	
578-401	0	1	1							1			1		1			1								1						1	
578-402	0	0	0								1		1					1	1							1			1	1		1	
578-403	0	1	1										1								1					1						1	
578-404	0	1	1							1			1					1			1					1						1	
591-403	0	1	1				1				1							1								1						1	
591-405	0	1	1					1		1			1		1						1					1						1	
591-407	0	1	1							1	1		1								1					1						1	
591-409	0	1	1										1								1					1						1	
592-401	0	0	0			1					1		1		1					1						1						1	
592-402	0	0	0					1		1	1	1								1						1						1	
592-403	0	0	0				1			1									1					1		1						1	
592-404	0	0	0					1		1			1		1					1						1						1	
592-405	0	0	0			1							1		1						1					1						1	
592-406	0	0	0			1							1							1				1		1						1	
592-407	0	0	0					1		1	1		1		1			1						1		1						1	
592-408	0	0	0							1			1		1					1				1		1						1	
592-409	0	0	0			1							1							1						1						1	

Control Lake Project

Mitigation Measures by Harvest Unit

	Alt. 10	Alt. 11	Alt. 12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
592-410	0	0	0			1					1		1							1						1						1	
592-411	0	0	0				1			1	1					1				1						1						1	
592-413	0	0	0			1	1	1		1	1								1							1						1	
592-414	0	0	0				1			1								1								1						1	
593-401	0	0	1						1	1			1		1			1								1						1	
593-402	0	1	1			1		1		1	1		1		1		1			1						1						1	
593-403	0	0	0							1	1		1		1					1						1						1	
593-406	0	0	0					1		1			1		1			1								1						1	
593-407	0	0	0					1		1	1		1		1						1					1						1	
593-408	0	1	1							1	1		1					1						1		1						1	
593-409	0	1	1							1	1		1		1						1					1						1	
593-410	0	1	1			1		1			1									1						1						1	
593-417	0	1	1								1				1						1				1	1						1	
593-418	0	1	1			1		1		1	1		1		1						1					1						1	
593-419	0	1	1			1				1			1								1					1						1	
593-420	0	0	1								1		1					1			1					1						1	
593-421	0	0	1								1		1					1								1	1					1	
593-422	0	0	1			1				1	1		1					1								1						1	
593-424	0	0	1							1	1		1		1			1								1						1	
593-425	0	0	0			1	1											1								1						1	
593-426	0	0	0			1				1					1			1			1			1		1						1	
593-430	0	0	0							1			1					1								1						1	
593-431	0	1	1								1		1								1					1						1	
594-401	0	1	1			1				1	1	1	1				1			1													
594-405	0	1	1							1	1		1								1												
594-407	0	1	1			1		1			1		1		1					1													
594-409	0	1	1					1		1	1				1			1		1													
594-410	0	1	1			1		1		1	1		1		1			1		1													
594-411	0	1	1			1	1	1		1	1		1		1				1		1												
594-412	1	1	1					1	1	1	1		1		1					1													
594-413	0	1	1			1	1	1		1	1		1		1						1												
594-415	0	1	1					1		1	1		1							1													

				Control Lake Project																															
				Mitigation Measures by Harvest Unit																															
	Alt.	Alt.	Alt.																																
	10	11	12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
594-416	0	1	1							1	1	1	1								1												
594-417	0	1	1								1		1					1															
594-418	0	1	1				1				1								1						1								
594-419	1	1	1			1	1	1		1	1								1														
594-420	1	1	1			1		1		1	1		1								1												
595-402	0	1	1								1							1								1						1	
595-403	0	1	1					1		1	1		1					1								1						1	
595-405	0	1	1							1	1		1							1						1						1	
595-406	1	1	1			1				1	1		1		1					1						1						1	
595-407	1	1	1								1										1												
595-408	1	1	1							1	1		1		1						1												
595-409	1	1	1								1		1		1			1															
595-410	0	0	1			1				1						1		1															
595-411	0	1	1								1	1	1				1				1					1						1	
595-412	0	1	1			1				1	1		1							1						1						1	
595-413	0	1	1					1			1		1		1						1												
595-414	1	1	1							1	1										1												
595-415	1	1	1					1		1	1									1													
595-416	0	0	1							1	1							1			1												
595-418	0	1	1					1					1							1													
595-419	1	1	1								1		1								1						1						
595-420	1	1	1							1	1	1	1		1			1			1												
595-421	0	1	1						1	1	1		1							1													
595-422	1	1	1							1					1						1						1						
595-423	1	1	1			1		1			1		1					1															
595-424	0	1	1			1		1		1	1		1								1												
595-431	1	1	1								1	1	1							1	1						1						
595-433	1	1	1							1	1		1		1						1												
595-434	0	1	1								1	1	1								1					1						1	
596-401	0	0	0			1		1			1							1								1						1	
596-402	0	0	0			1		1			1		1					1			1					1						1	
596-403	0	0	0					1		1					1			1			1					1						1	

Control Lake Project

Mitigation Measures by Harvest Unit

	Alt. 10	Alt. 11	Alt. 12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
596-404	0	1	1					1										1								1				1		1	
596-406	0	1	1		1						1							1	1							1				1		1	
596-407	0	1	1								1							1								1				1		1	
596-409	0	1	1					1		1	1								1							1						1	
596-410	0	1	1					1		1	1				1			1			1					1						1	
596-412	0	0	0							1	1		1		1			1								1						1	
ESTIMATE	0	0	0						1	1			1		1					1						1						1	
596-414	0	0	0							1			1		1			1								1						1	
596-415	0	0	0							1	1		1		1						1												
596-416	0	1	1			1				1	1							1		1	1					1						1	
596-417	0	1	1					1		1			1		1		1				1					1						1	
596-418	0	0	1							1			1		1						1					1						1	
596-419	0	0	0								1		1				1				1					1						1	
596-420	0	0	0							1	1										1					1	1					1	
596-421	1	0	0			1		1			1		1								1					1						1	
596-422	0	0	0							1	1										1					1						1	
596-423	0	0	0			1				1	1		1								1					1						1	
596-424	0	0	0			1	1	1			1							1								1						1	
596-425	0	0	0				1				1							1								1						1	
596-426	0	0	0							1	1	1	1								1				1	1	1					1	
597.1-401	1	0	0							1			1					1		1												
597.1-402	1	0	1							1			1		1			1														
597.1-403	0	0	0							1			1		1			1														
597.1-404	0	0	0							1			1					1						1								
597.1-406	0	0	1							1			1							1												
597.1-407	0	0	1						1	1			1		1						1											
597.1-409	1	0	1							1			1		1			1														
597.1-410	0	1	1							1			1		1					1												
597.2-414	1	1	1					1			1		1								1											
597.2-416	1	1	1							1			1								1											
597.2-417	1	1	1							1			1							1												
597.2-418	1	1	1								1		1								1											

				Control Lake Project Mitigation Measures by Harvest Unit																														
	Alt.	Alt.	Alt.																															
	10	11	12	M1	M2*	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	T1	W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12*	V1	V2	V3	R1	C1*
597.2-419	1	1	1							1			1		1						1												
597.2-420	1	1	1					1					1							1													
597.2-421	0	1	1							1	1		1								1												
597.2-422	1	1	1							1			1							1							1						
597.2-424	0	0	1							1			1					1															
597.2-425	0	0	1							1			1					1															
597.2-426	1	1	1							1			1		1			1															
597.2-427	0	1	1							1			1					1									1						
597.2-428	0	1	1							1			1								1												
597.2-430	1	1	1							1			1							1							1						
597.2-431	0	0	0					1			1		1								1												
597.2-434	0	1	1							1	1		1		1			1									1						1
597.2-435	0	1	1							1	1		1		1					1													
597.2-437	0	1	1						1	1			1		1			1		1													
597.2-438	0	1	1							1			1		1			1			1												
597.2-439	0	1	1			1		1			1		1								1												
597.2-445	1	1	1								1								1														
597.2-446	1	1	1								1								1														
597.2-447	1	1	1							1			1		1			1		1													
597.2-448	0	1	1						1	1			1				1			1													
597.2-449	1	1	1								1	1	1								1												
597.2-450	1	1	1							1	1		1				1			1													
597.2-457	1	1	1					1			1		1							1													
597.2-458	1	1	1								1		1								1												
597.2-459	1	1	1							1	1		1		1						1												
597.2-460	1	1	1							1			1		1						1												
597.2-461	1	1	1							1			1							1							1						
	38	98	123																														

Appendix D

Revised Unit and Road Design Cards

Unit Design Cards

Control Lake Supplemental Draft EIS

CONTROL LAKE PROJECT
HARVEST UNIT DESIGN CARD

VCU : 593 UNIT : 419 QUAD : C4-SW

Revised Control Loke Project Boundory
Post-Field Unit Boundory w/ Setting Codes
Other Post-Field Unit Boundories
USFS Timber Types for Volc 4-7
Eogle Tree Buffer of 330ft
Existing & Rebuilt Roods
F.S. Roods Under Construction
Post-Field Proposed Roods
Ahmu-Closs 1 & Streom Chantypes
Ahmu-Closs 2 & Streom Chontypes
Ahmu-Closs 3 & Streom Chontypes
★ Chonnel Type Chonge

Lakes and Ponds
Second Growth Units
MMI 4
McGilvery > 41
● Londings
Stream & Loke NoCUT Buffers

.5 MILE

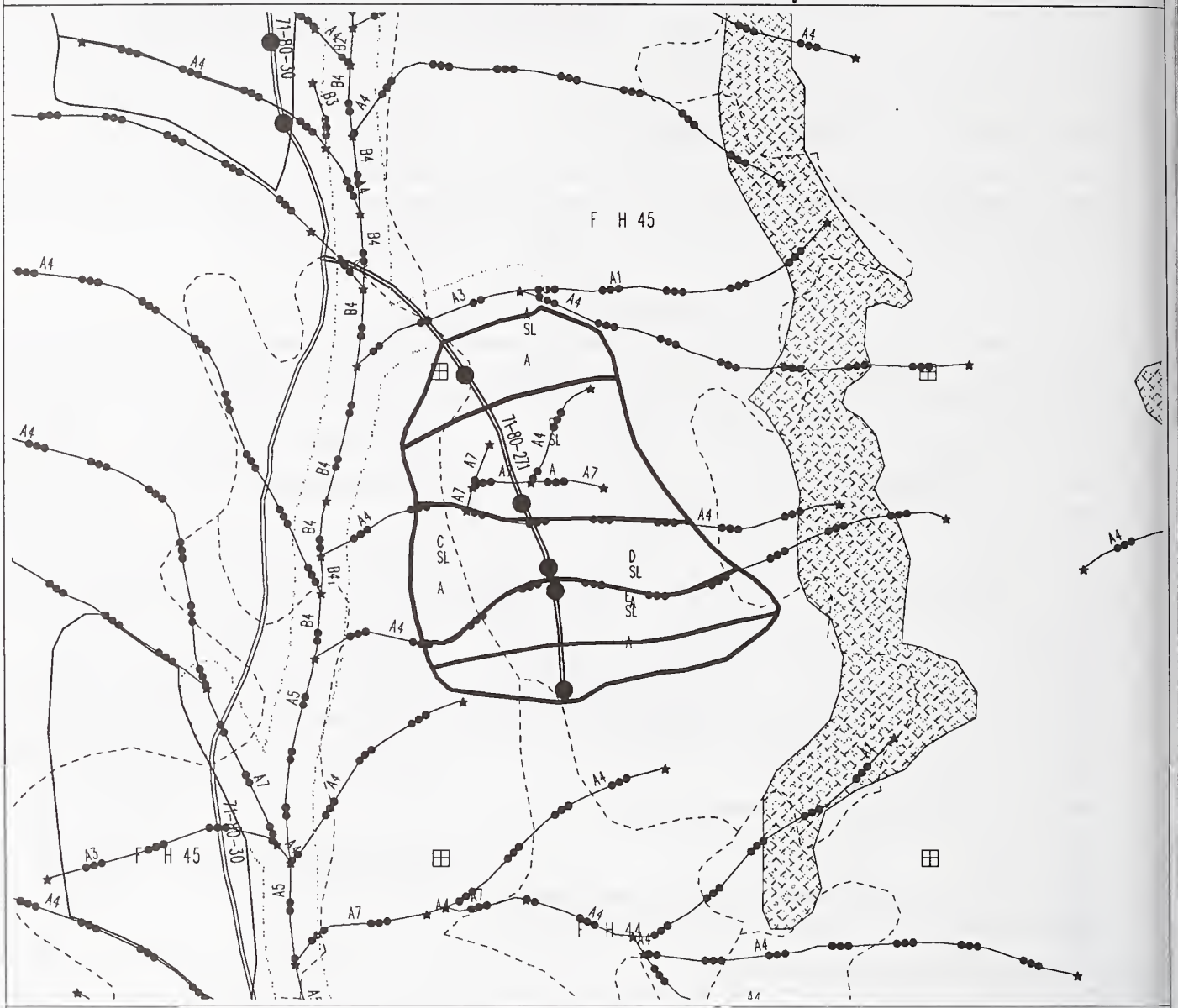
May 16, 1994

CONTROL LAKE PROJECT HARVEST UNIT DESIGN CARD

VCU #: 593	UNIT #: 419	QUARTER QUAD: C4SW	PHOTO YR/#: 1991/1990-75
ACRES: 39.3	VOL.: 1281.0 MBF	LOGGING SYSTEM: Swingyarder/Running Skyline, Shovel	
LANDSCAPE ZONE: Located in Eleven-Mile Block.			
Timber/Vegetation	Field Review: J. Miller, 7/21/93	Office Review: J. Goering	
Species composition predominantly hemlock but includes some spruce. Regeneration predominantly hemlock but includes a few spruce. Heavy amount of mistletoe infection evident in canopy. Some thin soil, poor soil drainage areas in the eastern portion with windfall. Exclude the eastern edge near the slope break due to soil stability concerns.			
Logging/Transportation	Field Review: E. DeWilde/D. Keister, 7/22/93	Office Review: M. Whitty	
Unit is accessed by Road #71-79-34.2 and five short spurs. The western half should be shovel logged and the east half should use a swing yarder with running skyline. Partial suspension will be possible. Partial cut is possible. The east boundary has a 240 foot stream buffer. This looks excessive and should be verified during final layout. Spurs on west are not flagged in field.			
Watershed/Fisheries	Field Review: B. Romey, 7/17/93	Office Review: G. McNaughton	
Stream 1 needs to be buffered 200' from bottom of slope break to eliminate unstable side slopes from unit. Stream 2 need 100' buffer (TTRA). Split yard, directional fall away from Stream 3.			
Soils/Geology	Field Review: B. Romey, 7/17/93	Office Review: G. McNaughton	
Slumps, slides, and seeps on side slopes along east boundary of unit. Buffer 200' up from bottom of slope break.			
Wildlife	Field Review: B. Romey, 7/17/93	Office Review: M. Hall	
Heavily used muskeg on west side of unit by bear and deer - leave buffer for wildlife corridor. Woodpecker observed and audible in unit. Red-tailed hawk nesting site observed by TC. Eagle observed flying over unit. Retain Level 1 structure.			
Visual/Recreation	Field Review:	Office Review: S. Bedross, M. Greenig	
Unit not seen from any priority travel route or use area.			
Cultural/Lands	Field Review:	Office Review: T.W. Greiser, M. Greenig	
Cultural - Unit outside of high probability areas for cultural resources. Lands - No state/private or encumbered lands occur adjacent to unit.			
Interdisciplinary Team Recommendations			
Maintain boundary at slope break due to stability concerns. Boundary flagged beyond here in field. Modified boundary by dropping portion above stream located on northwest boundary. Splityard Class III stream in east-central part of unit. Type A clearcut due to heavy mistletoe. Mitigation measures for this unit are as follows: F1, F5, F8, and W5. Note: Unit has been changed to a helicopter logging system in the SDEIS. Therefore, a Type C prescription is appropriate.			

CONTROL LAKE PROJECT
HARVEST UNIT DESIGN CARD

VCU : 594 UNIT : 413 QUAD : C4-NE



Revised Control Lake Project Baundary
Past-Field Unit Boundary w/ Setting Codes
Other Post-Field Unit Boundaries
USFS Timber Types for Valc 4-7
Eagle Tree Buffer of 330ft
Existing & Rebuilt Roads
F.S. Roads Under Construction
Post-Field Proposed Roads
Ahmu-Class 1 & Stream Chantypes
Ahmu-Class 2 & Stream Chantypes
Ahmu-Class 3 & Stream Chantypes
Channel Type Change

Lakes and Ponds
Second Growth Units
MMI 4
McGilvery > 41
Landings
Stream & Lake NoCUT Buffers

.5 MILE

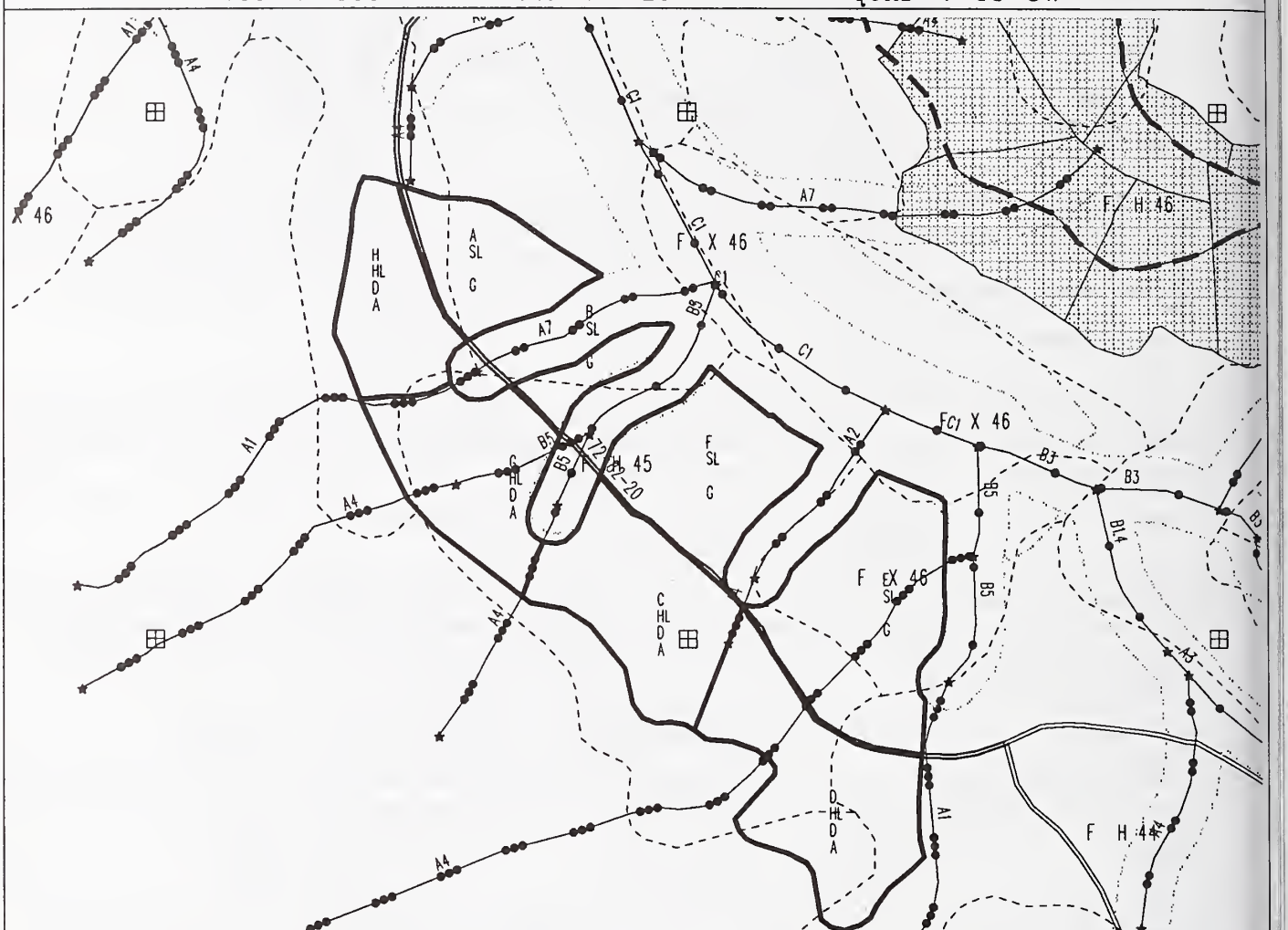
June 09, 1994

CONTROL LAKE PROJECT HARVEST UNIT DESIGN CARD

VCU #: 594	UNIT #: 413	QUARTER QUAD: C4NE	PHOTO YR/#: 1991/1290-17
ACRES: 36.9	VOL.: 1514.4 MBF	LOGGING SYSTEM: Slackline, Live Skyline	
LANDSCAPE ZONE: Unit is north of Big Salt Lake, but outside the Kogish Mountain Corridor.			
Timber/Vegetation	Field Review: B. Hasebe, 7/17/93	Office Review: J. Goering	
Species composition predominantly hemlock with some spruce. Few cedar are present. Regeneration predominantly hemlock with a few spruce but is lacking cedar. Rock bluffs on the higher elevations of the unit. Steep relatively shallow soils, and poor soil drainage areas within unit. Slope instability/failure potential existing due to poor soil drainage. Evidence of previous slides present. Western portion has moderately low volume yellow cedar and mixed species with <50% canopy closure.			
Logging/Transportation	Field Review: E. DeWilde/D. Keister, 7/10/93	Office Review: J. Doyal	
Unit is accessed by Road #71-80-27.1. Recommend a 100 foot tower with slackline capability. Ninety percent is downhill logging. Partial suspension can be achieved. The east boundary avoids unstable soils and bluffs. Partial cut is not practical because of downhill logging. Blowdown is a concern. Good economics.			
Watershed/Fisheries	Field Review: J. Metzler/S. Tanguay, 7/02/93	Office Review: T. Stewart	
Numerous small, Class III streams within the unit that flow into a Class II downstream of the unit. Split yard and directional fall to minimize disturbance to banks and avoid diversion of flow. The stream along the north boundary has experienced a debris flow in the past. It spreads into several channels below 1,200' elevation where lower gradient. Keep north unit boundary at least 25' to south.			
Soils/Geology	Field Review: J. Metzler, 7/02/93	Office Review: T. Stewart	
Numerous short, broken bluffs throughout unit especially above 1,400' elevation. Shallow soils on bluffs; put top line below as shown on topographic map. Achieve at least partial suspension on high MMI soils found throughout unit.			
Wildlife	Field Review: S Tanguay, 7/02/93	Office Review: M. Hall	
Moderate deer use. Low bear use. Woodpecker cavities observed in unit. Recommend buffer on unproductive old-growth and muskeg east of unit by keeping unit boundary to west of scrub. Retain Level 1 structure.			
Visual/Recreation	Field Review:	Office Review: S. Bedross, M. Greenig	
Unit not seen from any priority travel route or use area.			
Cultural/Lands	Field Review:	Office Review: T.W. Greiser, M. Greenig	
Cultural - Unit outside of high probability areas for cultural resources. Lands - No state/private or encumbered lands occur adjacent to unit.			
Interdisciplinary Team Recommendations			
Boundary placed below bluffs. Directional fall and split yard Class III streams. Maintain 100' buffers on Class II unit at north end and 25 foot buffer on Class III along northeast border. Ensure that the retention associated with Type A prescription, will minimize windthrow along the north and northeastern borders. Achieve partial suspension on unit. Retain area uphill from Streams 2, 3, and 5. Type A harvest. Mitigation measures for this unit are: F1, F2, F3, F5, F6, F8, F10, and W5.			

CONTROL LAKE PROJECT
HARVEST UNIT DESIGN CARD

VCU : 595 UNIT : 420 QUAD : C3-SW



- Revised Control Lake Project Boundary
- Post-Field Unit Boundory w/ Setting Codes
- Other Post-Field Unit Boundaries
- USFS Timber Types for Volc 4-7
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- Post-Field Proposed Roods
- Ahmu-Class 1 & Stream Chantypes
- Ahmu-Class 2 & Streom Chontypes
- Ahmu-Class 3 & Stream Chantypes
- ★ Channel Type Change

- Lakes and Ponds
- Second Growth Units
- MMI 4
- McGilvery > 41
- Londings
- Stream & Loke NoCUT Buffers

.5 MILE

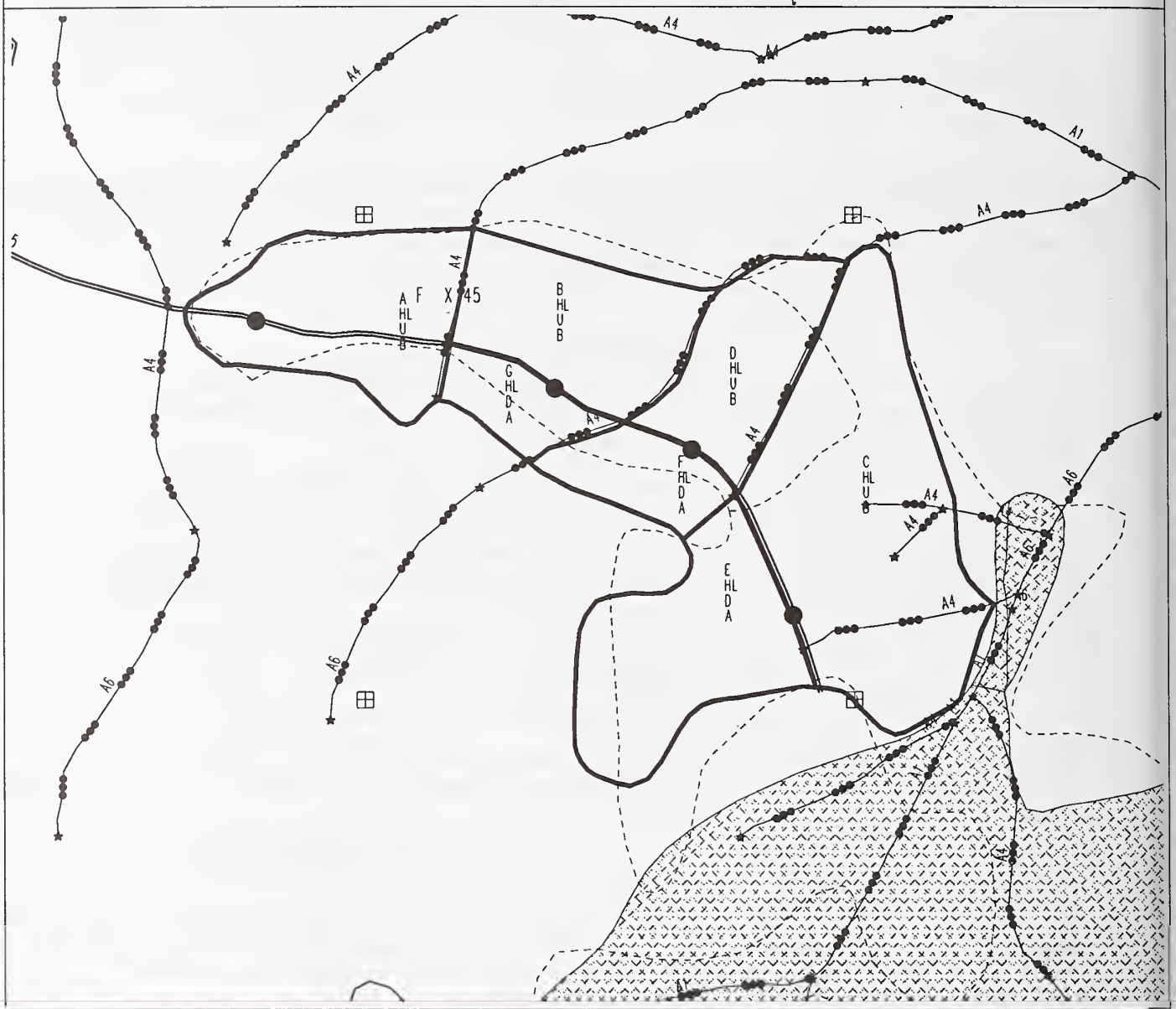
May 16, 1994

CONTROL LAKE PROJECT HARVEST UNIT DESIGN CARD

VCU #: 595	UNIT #: 420	QUARTER QUAD: C3SW	PHOTO YR/#: 1990-102
ACRES: 60.1	VOL.: 1861.7 MBF	LOGGING SYSTEM: Slackline with 100' Tower/Highlead	
LANDSCAPE ZONE: Unit is in Steelhead Creek drainage, southwest of Rio Roberts Watershed.			
Timber/Vegetation	Field Review: S. Karstens/J. Goering, 6/24/93	Office Review: J. Goering	
Species composition predominantly hemlock with some cedar. Few spruce are present. Predominantly hemlock regeneration. Shallow soils overlying bedrock. Steep, rocky slope, relatively thin soils and exposed rock. Deep V-notches present in northern and southern portion composed of rocky soils and bedrock. Probable salmonberry incursions with soil/site disturbance based on existing high densities. Promote spruce and cedar regeneration through partial retention or shelterwood harvest.			
Logging/Transportation	Field Review: J. Doyal/E. Dewilde/J. Herzberg, 6/21/93	Office Review: C. Barnhart	
Unit is accessed by Road #72-82-20. This road has difficult V-notch crossings. Recommend highlead downhill and slackline for uphill logging. The east boundary has a 200 foot stream buffer. Partial suspension can be achieved, but is not required. Partial cut is not feasible on downhill portion. Fair economics.			
Watershed/Fisheries	Field Review: J. Knutzen, 6/17/93	Office Review: T. Stewart	
Split yard all Class III streams. Stream in most north area buffer to slope break in V-notch. Split yard V-notch streams or attain 100% suspension. Stream 4 needs upper 2/3 of selective cut below slope break to reduce soil disturbance. 25' buffer next 400' and possibly 100' buffer as this section may be Class I or II when flow returns. Make southeast stream unit boundary. Supply 200' buffer for northeast boundary stream.			
Soils/Geology	Field Review: J. Knutzen, 6/17/93	Office Review: T. Stewart	
No concerns. Unit has gentle slopes and good stability.			
Wildlife	Field Review: H. Sloan, 6/17/93	Office Review: M. Hall	
HCC units adjacent to unit (north to northeast) wetlands to the south. Level 2 structure. Moderate to heavy deer use. Bear use also evident.			
Visual/Recreation	Field Review:	Office Review: S. Bedross, M. Greenig	
Unit not seen from any priority travel route or use area.			
Cultural/Lands	Field Review:	Office Review: T.W. Greiser, M. Greenig	
Cultural - Unit outside of high probability areas for cultural resources. Lands - No state/private or encumbered lands occur adjacent to unit.			
Interdisciplinary Team Recommendations			
Type A clearcut in downhill highlead settings, and Type G shelterwood in uphill slackline settings for regeneration and soil concerns. Maintain 100' buffers on both Class II streams in unit (not flagged field), and a 200' buffer on Class I stream along northeast boundary. Class I stream along south boundary requires a 100' no cut plus 50' selective cut buffer. Split yard all streams in unit. V-notch stream at north end requires harvesting to be limited to slope break. Ensure that the retention associated with Type A prescription will minimize blowdown along v-notch buffer. Class III stream in southern portion of unit requires selective cut below slope break. This stream should be reviewed prior to final layout and possibly upgraded to Class I or II. Mitigation measures for this unit are F5, F6, F7, F8, F10, W2, and W5.			

CONTROL LAKE PROJECT
HARVEST UNIT DESIGN CARD

VCU : 595 UNIT : 431 QUAD : C3-SW



Revised Control Lake Project Boundary
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Channel Type Change

Lakes and Ponds
Second Growth Units
MMI 4
McGilvery > 41
Landings
Stream & Lake NoCUT Buffers

.5 MILE

May 17, 1994

CONTROL LAKE PROJECT HARVEST UNIT DESIGN CARD

VCU #: 595	UNIT #: 431	QUARTER QUAD: C3SW	PHOTO YR/#: 1991/990-102, 103
ACRES: 84.6	VOL.: 3024.3 MBF	LOGGING SYSTEM: Highlead	
LANDSCAPE ZONE: Unit located in Upper Steelhead Drainage.			
Timber/Vegetation	Field Review: M. Case, 7/7/93	Office Review: J. Goering	
Species composition predominantly hemlock and cedar with a few spruce present. Regeneration predominantly hemlock but includes a few cedar and spruce. Low to moderate amounts of mistletoe infection evident in canopy. Steep, rocky, and shallow soils. Many small streams, and poor soil drainage areas. Low to moderate amounts of stem decay evident in hemlock. Promote spruce/cedar regeneration through planting.			
Logging/Transportation	Field Review: J. Doyal/J. Herzberg/D. Deister, 7/06/93	Office Review: C. Barnhart/M. Whitty	
Partial suspension is available with large tower and slackline system (not required), otherwise highlead. Split settings at Class III streams where possible. A partial cut may be feasible. Accessed by Road #72-82-19.5. 70% uphill and 30% downhill yarding.			
Watershed/Fisheries	Field Review: G. Jackson, 6/29/93	Office Review: T. Stewart	
The unit is dissected by five Class III streams, each of which occupies a V-notch. Three of the streams are in the southeast corner of the unit, while another bisects the unit, running southwest to northeast, and the other runs the same direction and is located in the western third of the unit. Harvest should only be to the break in slope at the top of the V-notches.			
Soils/Geology	Field Review: G. Jackson, 6/29/93	Office Review: T. Stewart	
Gentle to moderate slopes throughout most of unit. Northeast side has terrain up to 100% in slope and two V-notch streams. Recommend excluding this area. Most of what was mapped as MMI4 soil does not have a very high potential for mass wasting.			
Wildlife	Field Review: C. Confer, 6/29/93	Office Review: R. Fairbanks	
Two black bear seen in muskeg south of southwest unit boundary. Sandhill crane heard north of unit. Structure retention level 2. Murrelet survey with no detections. Goshawk survey with no detections.			
Visual/Recreation	Field Review:	Office Review: S. Bedross, M. Greenig	
Unit not seen from any priority travel route or use area.			
Cultural/Lands	Field Review:	Office Review: T.W. Greiser, M. Greenig	
Cultural - Unit outside of high probability areas for cultural resources. Lands - No state/private or encumbered lands occur adjacent to unit.			
Interdisciplinary Team Recommendations			
Type A clearcut above (south of the road). Type B clearcut with retention of diversity of all species and diameter classes along the lower portion of the unit boundary. Retain approximately 50% of the basal area in groups between yarding corridors along the bottom 15' to 200' from flagged unit boundary. This will help provide structure within this heavily harvested drainage. Split yard all streams in unit. Mitigation measures for this unit are: F6, F7, F8, W4 (below road), W5 (above road), and W11. Note: A much shorter road, accessing the unit from the northeast was found to be feasible during subsequent field investigations. During final layout give strong consideration to using this new route to reduce the large number of stream crossings associated with the original route.			

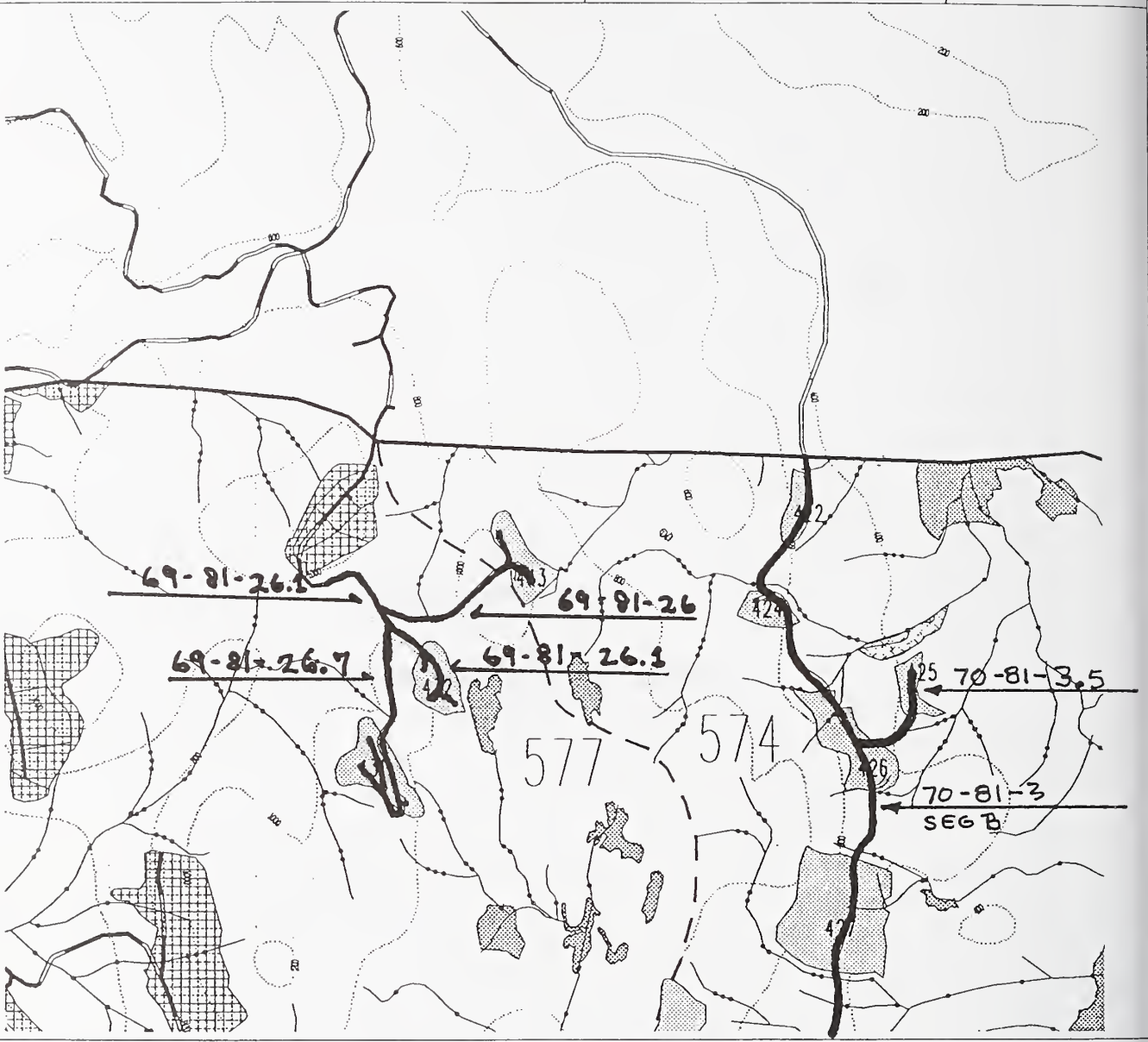
Road Design Cards

Control Lake Supplemental Draft EIS

CONTROL LAKE PROJECT
ROAD DESIGN CARD

"b"

ROAD : 69-81 VCU : 574/577 QUAD : D3NW/SW



- Revised Control Lake Project Boundary
- Unit Boundary
- Eagle Tree Buffer of 330ft
- VCU Boundary
- Existing & Rebuilt Roads
- Proposed Roads
- Subject Road
- Class 1 Stream
- Class 2 Stream
- Class 3 Stream
- Lakes, Ponds, Ocean
- Second Growth
- MMI 4
- McGilvery > 41%
- Units
- Landing

Contour Interval 200 feet

SCALE 1:31,680 1 INCH = 1/2 MILE

0 1/2 1 1 1/2 2

August 29, 1994

CONTROL LAKE PROJECT ROAD DESIGN CARD

square: "b"

MAIN ROAD #: 69-81-26	VCU: 577 & 574	TOTAL LENGTH: 3538 FEET
ROAD CLASS: local	SERVICE LEVEL: D	
MAINTENANCE LEVEL: 1	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: _____0_____ - CLASS II: _____1_____		
Engineering	Field Review: B. Flatz, B. Wilkinson	Office Review: M. Whitty
Main Road: Length: 3090'; Construction: 97% Easy, 3% Medium, 00% Difficult; # of >48" Culverts: 0; # of Bridges: 0; Ft. of Cross Slopes >55%: 0; Ft. of Muskeg Crossing: 1974'; # of "V" Notches: 0; Units Accessed: 577-443; # of Quarry Sites: 0; # of Switchbacks: 0; Ft. of Critical Grades: 255'. Spurs: Road #: 69-81-26.2, Length: 448', Construction type: easy Comments: This is a road that is primarily easy construction. Sideslopes are 0-25%. Note that although a large portion of the road is in muskeg, very little rock was encountered. Look for a good rock source during final layout.		
Timber/Silviculture		Comments by: J. Boyce
Maintain access for future silvicultural activities.		
Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart
Road crosses a class II stream. No timing restrictions are necessary but culverts will be designed to allow fish passage during normal and low flows, and to minimize downstream scour (BMP 14.17).		
Soils/Geology		Comments by: T. Stewart
All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8).		
Wildlife		Comments by: C. Confer
Road does not approach within 1/2 mile of any known bald eagle nest sites.		
Visual/Recreation		Comments by: R. Suttle/M. Greenig
This segment of the road will not be visible from a Priority Travel Route/Use Area.		
Other Resources	Field Review:	Comments by: W. Greiser/M. Greenig
Cultural - Road is outside of high probability areas for cultural resources. Lands - No state/private encumbered lands occur adjacent to the road.		

CONTROL LAKE PROJECT ROAD DESIGN CARD

square: "b"

MAIN ROAD #: 69-81-26.1	VCU: 577	TOTAL LENGTH: 4064 FEET
ROAD CLASS: Local	SERVICE LEVEL: C	
MAINTENANCE LEVEL: 1	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: 0 - CLASS II: 0		
Engineering	Field Review: E. Urstadt, J. Herzberg	Office Review: M. Whitty
Main Road: Length: 3590'; Construction: 95% Easy, 5% Medium, 0% Difficult; # of >48" Culverts: 0; # of Bridges: 0; Ft. of Cross Slopes >55%: 166'; Ft. of Muskeg Crossing: 1218'; # of "V" Notches: 0; Units Accessed: 577-431,432,443 # of Quarry Sites: 0; # of Switchbacks: 0; Ft. of Critical Grades: 166'. Spurs: Road #: 69-81-26.1A Length: 275', Construction type: Easy Road #: 69-81-26.1B Length: 199', Construction type: Easy Comments: This road system will access lakes in the area. Before final layout, see the 577-432 unit folder for an alternate location for the portion of the road within that unit.		
Timber/Silviculture		Comments by: J. Boyce
Maintain access for future silvicultural activities.		
Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart
Road crosses a class II stream. No timing restrictions are necessary but culverts will be designed to allow fish passage during normal and low flows, and to minimize downstream scour (BMP 14.17).		
Soils/Geology		Comments by: T. Stewart
All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8).		
Wildlife		Comments by: C. Confer
Road does not approach within 1/2 mile of any known bald eagle nest sites.		
Visual/Recreation		Comments by: R. Suttle/M. Greenig
This segment of the road will not be visible from a Priority Travel Route/Use Area.		
Other Resources		Comments by: W. Greiser/M. Greenig
Cultural - Road is outside of high probability areas for cultural resources. Lands - No state/private encumbered lands occur adjacent to the road.		

CONTROL LAKE PROJECT ROAD DESIGN CARD

square: "b"

MAIN ROAD #: 69-81-26.7	VCU: 577	TOTAL LENGTH: 4930 FEET
ROAD CLASS: local	SERVICE LEVEL: D	
MAINTENANCE LEVEL: 1	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: 0 - CLASS II: 1		
Engineering	Field Review: K. Marin, B. Flatz, D. Keister	Office Review: K. Jehnke
Main Road: Length: 3930'; Construction: 28% Easy, 66% Medium, 6% Difficult; # of >48" Culverts: 0; # of Bridges: 0; Ft. of Cross Slopes >55%: 0; Ft. of Muskeg Crossing: 830'; # of "V" Notches: 0; Units Accessed: 577-431; # of Quarry Sites: 1; # of Switchbacks: 1; Ft. of Critical Grades: 480'. Spurs: Road #: 69-81-26.8, Length: 800', Construction type: easy Road #: 69-81-26.9, Length: 200', Construction type: easy Comments: The original road grade on the original paper plan came from an existing USFS road from the southwest. That location was attempted but not used due to extensive slide activity in that area.		
Timber/Silviculture		Comments by: J. Boyce
Maintain access for future silvicultural activities.		
Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart
Road crosses a class II stream. No timing restrictions are necessary but culverts will be designed to allow fish passage during normal and low flows, and to minimize downstream scour (BMP 14.17).		
Soils/Geology		Comments by: T. Stewart
All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8).		
Wildlife		Comments by: C. Confer
Road does not approach within 1/2 mile of any known bald eagle nest sites.		
Visual/Recreation		Comments by: R. Suttle/M. Greenig
This segment of the road will not be visible from a Priority Travel Route/Use Area.		
Other Resources	Field Review:	Comments by: W. Greiser/M. Greenig
Cultural - Road is outside of high probability areas for cultural resources. Lands - No state/private encumbered lands occur adjacent to the road.		

CONTROL LAKE PROJECT ROAD DESIGN CARD

square: "b"

MAIN ROAD #: 70-81-3 (Seg. B)	VCU: 574 & 577	TOTAL LENGTH: 15106 FEET
ROAD CLASS: collector	SERVICE LEVEL: B	
MAINTENANCE LEVEL: 3	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: 1 - CLASS II: 5		

Engineering	Field Review: J. Doyal, J. Herzberg, J.Graves	Office Review: E. Urstadt

Main Road: Length: 12577'; Construction: 96% Easy, 4% Medium, 0% Difficult; # of >48" Culverts: 0;
# of Bridges: 0; Ft. of Cross Slopes >55%: 0; Ft. of Muskeg Crossing: 234'; # of "V" Notches: 0;
Units Accessed: 5 units; # of Quarry Sites: 0; # of Switchbacks: 0; Ft. of Critical Grades: 1149'
Spurs: Road #: 70-81-3.6, Length: 150', Construction type: easy (unit 574-424)
Road #: 70-81-3.5, Length: 1600', Construction type: easy (unit 574-425)
Road #: 70-81-3.3, Length: 265', Construction type: easy (unit 574-426)
Road #: 70-81-3.2, Length: 514', Construction type: easy (unit 574-427)
Comments: The haul direction may be reversed on this road segment, because the 3 segments of this road form a loop and will be analyzed to determine the best haul route. The segment of the road which goes north from 574-422 is not field verified.

Timber/Silviculture		Comments by: J. Boyce

Maintain access for future silvicultural activities.

Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart

Class I stream crossing requires a construction timing window of July 18 to August 15. Stream crossed by the road drains directly to a class I stream, consequently a similar fish timing window of July 18 to August 15 is necessary. Road crosses a class II stream. No timing restrictions are necessary but culverts will be designed to allow fish passage during normal and low flows, and to minimize downstream scour (BMP 14.17).

Soils/Geology		Comments by: T. Stewart

All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8).

Wildlife		Comments by: C. Confer

Road does not approach within 1/2 mile of any known bald eagle nest sites.

Visual/Recreation		Comments by: R. Suttle/M. Greenig

Segment of the road for unit 574-422 will not be visible from a Priority Travel Route/Use Area. Other segments are within "Thorne River/Honker Canoe Route" Viewshed. Retention VQO. Should not be apparent to casual Forest visitor. Middleground Distance Zone.

Other Resources	Field Review:	Comments by: W. Greiser/M. Greenig

Cultural - Road is outside of high probability areas for cultural resources.
Lands - No state/private encumbered lands occur adjacent to the road.

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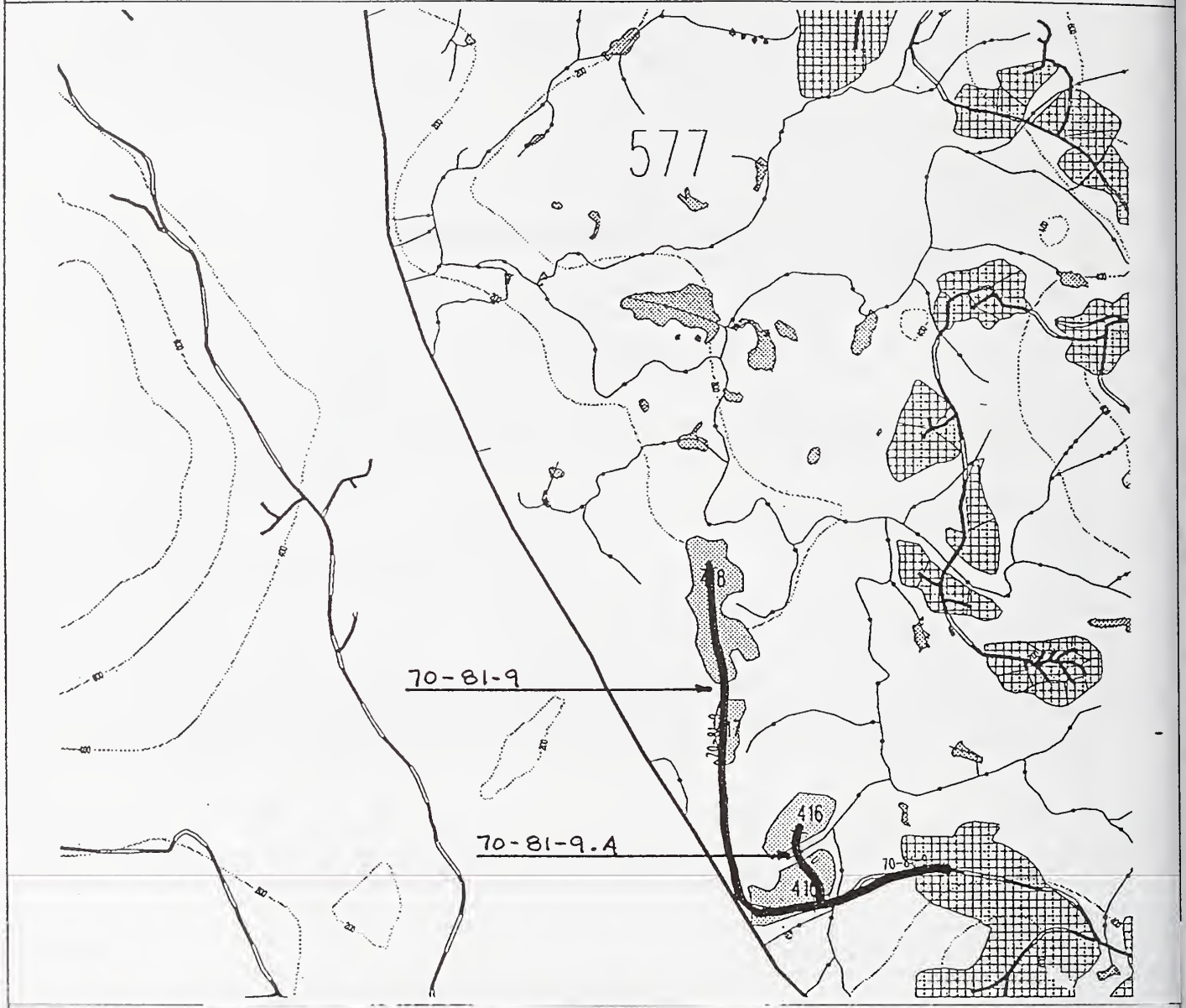
CONTROL LAKE PROJECT
ROAD DESIGN CARD

"d"

ROAD : 70-81 VCU : 577 QUAD : D3SW/D4SE



Revised Control Loke Project Boundory
Unit Boundory
Eagle Tree Buffer of 330ft
VCU Boundory
Existing & Rebuilt Roods
Proposed Roods
Subject Rood

Class 1 Stream
Class 2 Stream
Class 3 Stream

Lokes, Ponds, Oceon
Second Growth
MMI 4
McGilvery > 41%
Units
Landing

Contour Intervol 200 feet

SCALE 1:31,680 1 INCH = 1/2 MILE

0 1/2 1 1 1/2 2

October 04, 1994

CONTROL LAKE PROJECT ROAD DESIGN CARD

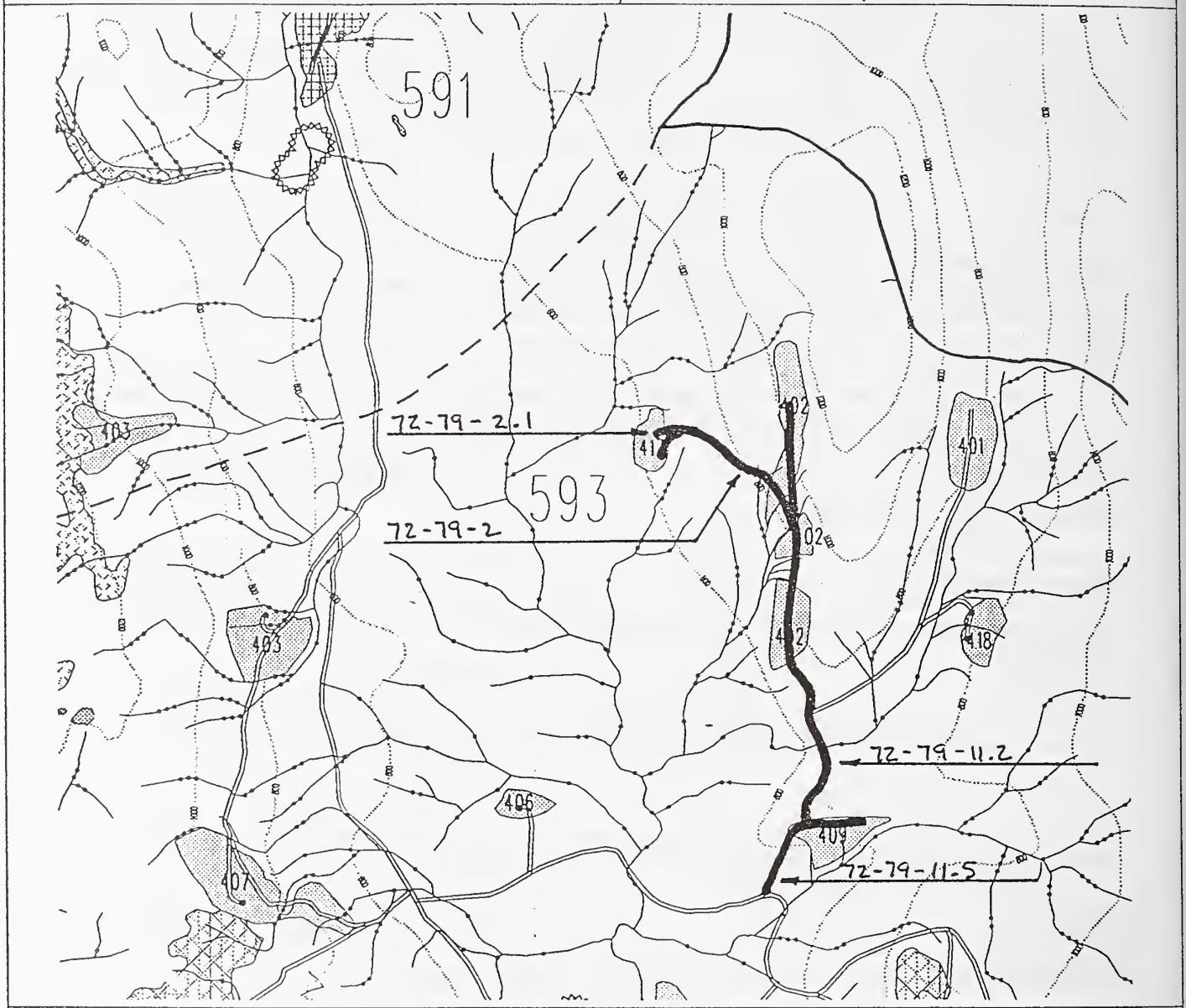
square: "d"

MAIN ROAD #: 70-81-9	VCU: 577	TOTAL LENGTH: 11430 FEET
ROAD CLASS: local	SERVICE LEVEL: D	
MAINTENANCE LEVEL: 1	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: _____ - CLASS II: _____		
Engineering	Field Review: T. Wetzel, G. Slawson	Office Review: C. Barnhart
Main Road: Length: 9610'; Construction: 97% Easy, 3% Medium, 0% Difficult; # of >48" Culverts: 1; # of Bridges: 0; Ft. of Cross Slopes >55%: 0'; Ft. of Muskeg Crossing: 1350'; # of "V" Notches: 1; Units Accessed: 3-units; # of Quarry Sites: 0; # of Switchbacks: 0; Ft. of Critical Grades: 0'. Spurs: Road #: 70-81-9.A, Length: 1820', Construction type: easy (unit 577-416) Comments: Construction is very easy with the average cross slopes being 5-15%. The road could be used to access a large lake to the west. For road segment 70-81-9A, during final layout consider moving road to northern part of unit. It could be moved west, avoiding the Class I stream crossing.		
Timber/Silviculture		Comments by: J. Boyce
Maintain access for future silvicultural activities.		
Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart
Class I stream crossing requires a construction timing window of July 18 to August 15.		
Soils/Geology		Comments by: T. Stewart
All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8).		
Wildlife		Comments by: C. Confer
Road does not approach within 1/2 mile of any known bald eagle nest sites.		
Visual/Recreation		Comments by: R. Suttle/M. Greenig
This segment of the road will not be visible from a Priority Travel Route/Use Area.		
Other Resources		Comments by: W. Greiser/M. Greenig
Cultural - No cultural resources encountered along portions of road within unit 577-418. Remainder of road is outside of high probability areas for cultural resources. Lands - No state/private encumbered lands occur adjacent to the road.		

CONTROL LAKE PROJECT
ROAD DESIGN CARD

"A"

ROAD : 72-79 VCU : 591/593 QUAD : C4NW



Revised Control Lake Project Boundary
Unit Boundary
Eagle Tree Buffer of 330ft
VCU Boundary
Existing & Rebuilt Roads
Proposed Roads
Subject Road

Class 1 Stream
Class 2 Stream
Class 3 Stream

Lakes, Ponds, Ocean
Second Growth
MMI 4
McGilvery > 41%
Units
• Landing

Contour Intervol 200 feet

SCALE 1:31,680 1 INCH = 1/2 MILE

0 1/2 1 1 1/2 2

August 29, 1994

CONTROL LAKE PROJECT ROAD DESIGN CARD

square: "A"

MAIN ROAD #: 72-79-2	VCU: 593	TOTAL LENGTH: 3642 FEET
ROAD CLASS: local	SERVICE LEVEL: D	
MAINTENANCE LEVEL: 1	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: __0_____ - CLASS II: ___1_____		
Engineering	Field Review: B. Wilkinson, J. Graves	Office Review: J. Doyal
Main Road: Length: 3252'; Construction: 95% Easy, 3% Medium, 2% Difficult; # of >48" Culverts: 0; # of Bridges: 0; Ft. of Cross Slopes >55%: 106'; Ft. of Muskeg Crossing: 865'; # of "V" Notches: 1; Units Accessed: 593-417; # of Quarry Sites: 0; # of Switchbacks: 0; Ft. of Critical Grades: 234'. Spurs: Road #: 72-79-2.1, Length: 390', Construction type: easy (unit 593-417) Comments: The main road accesses only one unit. The "V" notch is 10' deep and 40' wide. The critical grades are 12% adverse grades. During final layout consider whether a 48" culvert or bridge is appropriate for V-notch crossing.		
Timber/Silviculture		Comments by: J. Boyce
Maintain access for future silvicultural activities.		
Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart
Road crosses a class II stream. No timing restrictions are necessary but culverts will be designed to allow fish passage during normal and low flows, and to minimize downstream scour (BMP 14.17).		
Soils/Geology		Comments by: T. Stewart
Oversteepened slopes require full bench construction and end haul of waste (BMP 14.7). All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8).		
Wildlife		Comments by: C. Confer
Road does not approach within 1/2 mile of any known bald eagle nest sites.		
Visual/Recreation		Comments by: R. Suttle/M. Greenig
This segment of the road will not be visible from a Priority Travel Route/Use Area.		
Other Resources		Comments by: W. Greiser/M. Greenig
Cultural - Road is outside of high probability areas for cultural resources. Lands - No state/private encumbered lands occur adjacent to the road.		

CONTROL LAKE PROJECT ROAD DESIGN CARD

square: "A"

MAIN ROAD #: 72-79-11.2	VCU: 593	TOTAL LENGTH: 7750 FEET
ROAD CLASS: local	SERVICE LEVEL: D	
MAINTENANCE LEVEL: 1	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: __1_____ - CLASS II: ____2_____		
Engineering	Field Review: B. Wilkinson, J. Graves	Office Review: J. Doyal
Main Road: Length: 7750'; Construction: 44% Easy, 34% Medium, 22% Difficult; # of >48" Culverts: 0; # of Bridges: 1; Ft. of Cross Slopes >55%: 430'; Ft. of Muskeg Crossing: 1130', # of "V" Notches: 0; Units Accessed: 4-units; # of Quarry Sites: 2; # of Switchbacks: 0; Ft. of Critical Grades: 1880'. Spurs: None Comments: The beginning of the main road has one 50' span bridge. This bridge will be needed to access all four units in the area. (593-401,402,418,417). All of the critical grades are favorable.		
Timber/Silviculture		Comments by: J. Boyce
Maintain access for future silvicultural activities.		
Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart
Class I stream crossing requires a construction timing window of July 18 to August 15. Road crosses a class II stream. No timing restrictions are necessary but culverts will be designed to allow fish passage during normal and low flows, and to minimize downstream scour (BMP 14.17). Segment between units 593-409 and 593-402 crosses stream with a floodplain which requires placement of culverts on each side of stream to pass flood flows.		
Soils/Geology		Comments by: T. Stewart
Oversteepened slopes require full bench construction and end haul of waste (BMP 14.7). All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8). During bridge installation, erodible material will not be deposited in live streams and sediment laden water pumped away from foundation excavation will be pumped to settling areas identified during final design (BMP 14.17).		
Wildlife		Comments by: C. Confer
Road does not approach within 1/2 mile of any known bald eagle nest sites.		
Visual/Recreation		Comments by: R. Suttle/M. Greenig
This segment of the road will not be visible from a Priority Travel Route/Use Area.		
Other Resources		Comments by: W. Greiser/M. Greenig
Cultural - Road is outside of high probability areas for cultural resources. Lands - No state/private encumbered lands occur adjacent to the road.		

CONTROL LAKE PROJECT ROAD DESIGN CARD

square: "A"

MAIN ROAD #: 72-79-11.5	VCU: 593	TOTAL LENGTH: 2820 FEET
ROAD CLASS: local	SERVICE LEVEL: D	
MAINTENANCE LEVEL: 1	ACCESS STRATEGY: Prohibit	
TOTAL # STREAM CROSSINGS - CLASS I: ___0_____ - CLASS II: ___0_____		
Engineering	Field Review: J. Spolar, B. Wilkinson	Office Review: M. Whitty
Main Road: Length: 2820'; Construction: 100% Easy, 0% Medium, 0% Difficult; # of >48" Culverts: 0; # of Bridges: 0; Ft. of Cross Slopes >55%: 0'; Ft. of Muskeg Crossing: 100'; # of "V" Notches: 0; Units Accessed: Several; # of Quarry Sites: 0; # of Switchbacks: 0; Ft. of Critical Grades: 0'. Spurs: The last 820' of this road is actually a spur used only for 593-409 Comments: The first 2000' of this road will serve as a main road to access 5 units. There are no difficult areas of construction on this road.		
Timber/Silviculture		Comments by: J. Boyce
Maintain access for future silvicultural activities.		
Watershed/Fisheries		Comments by: J. Knutzen/T. Stewart
No special concerns.		
Soils/Geology		Comments by: T. Stewart
All areas of organic and mineral soil exposed during construction shall be grass seeded and fertilized (BMP 14.8).		
Wildlife		Comments by: C. Confer
Road does not approach within 1/2 mile of any known bald eagle nest sites.		
Visual/Recreation		Comments by: R. Suttle/M. Greenig
This segment of the road will not be visible from a Priority Travel Route/Use Area.		
Other Resources		Comments by: W. Greiser/M. Greenig
Cultural - Road is outside of high probability areas for cultural resources. Lands - No state/private encumbered lands occur adjacent to the road.		

Appendix E

Summary of Watershed Analyses

Appendix E

Control Lake Project
Summary of Watershed Analyses

1.0 INTRODUCTION

Watershed analysis is a procedure for assessing important riparian and aquatic habitat values and geomorphic processes within a watershed. It is to be considered within the overall context of ecosystem analysis (USDA Forest Service, 1997, Appendix J to the Forest Plan). It describes key aquatic and riparian resources, along with their habitat conditions and trends. The Control Lake Project studies have included extensive analyses relevant to the watershed analysis process. This appendix describes those studies relevant to watershed analysis and provides an overview of results for important watersheds.

2.0 DESCRIPTION OF ANALYSES CONDUCTED

The objective of this part of the appendix is to document the types of watershed analyses performed during studies supporting the Control Lake Environmental Impact Statement (EIS). For each analysis, a description is given of what was conducted and where it is documented. The components of watershed analysis outlined in the Watershed Analysis Handbook (Draft Version 2, July 1997, USDA Forest Service, Alaska Region) were used for categorizing these analyses.

Watershed delineation provides logical building blocks for resource project inventory, analysis, and planning. Similarly, stream mapping and classification provide logical building blocks for site-level land use prescriptions. For example, minimum buffer requirements based on stream classification can be expanded to increase stream protection or meet other resource objectives (such as wildlife habitat) based on site-level knowledge. The Control Lake project area includes 167 third order and larger watersheds. Resource data (e.g., vegetation, soils, streams, human uses, etc.) were looked at on the watershed scale or consolidated on a larger scale to look at logical larger pieces of the landscape. The ID Team used data arranged by stream, watershed, or larger landscape unit throughout project design and analysis. Thus, the descriptions that follow are grouped according to the scale of the analyses: landscape-level, watershed-level, and site-level. Note that cumulative effects analyses are discussed for each topic at the watershed level.

An extensive scoping and public involvement process was conducted for the Control Lake Project. The process was initiated with the mailing of a scoping package to individuals, agencies, and interested organizations on September 27, 1993. A news release was also issued and newspaper advertisements were placed about that time containing much of the same information and inviting comments. A Notice of Intent (NOI) to prepare an EIS was published in the Federal Register on October 6, 1993. Public scoping meetings were held in Klawock, Thorne Bay, and Ketchikan. Individual consultations also took place between Control Lake project team members and community representatives, environmental organizations, timber industry representatives, agency representative, and other interested parties. The Draft EIS was released in October 1995 and subsistence hearings and public open houses were held in

Klawock, Thorne Bay, Coffman Cove, and Ketchikan in December 1995. Many comments were received and reviewed and analyzed; responses are provided in Appendix B of the Supplemental Draft EIS. Refer to the *Scoping and Public Involvement* section of Chapter 2 of the Supplemental Draft EIS for further detail.

2.1 Landscape-level Analyses

At the largest scale, landscape-level assessment was initiated by the identification of landscape zones which subdivided the entire project area (see Chapter 2 of the DEIS). These landscape zones were defined based on field observations in conjunction with landscape-level considerations. Definition of landscape zones considered such aspects as the amount, distribution, and fragmentation of old-growth forests, the amount and distribution of previous timber harvest and roading, the recommendations of the VPOP Committee on Habitat Conservation Areas, wildlife travel and dispersal corridors between zones, Forest Plan land use designations, subsistence uses, visually sensitive areas, important recreation areas, adjacent land ownership and use, and other factors. Landscape zones served to guide both watershed and site-level prescriptions and analyses. For example, during the ID Team harvest unit review process, each timber harvest unit was individually evaluated with regard to its specific characteristics and its location within each landscape zone. Because the zones were drawn independently, a given harvest unit often occurred within the boundaries of two or more landscape zones. Considering these factors, the ID Team applied one of nine different silvicultural prescriptions to each setting within each unit. BMPs and mitigation measures were also prescribed giving consideration to landscape zones as well as other factors.

The risk of mass movement and erosion related to timber harvest and road building was recognized as a landscape-level issue. These processes are discussed in detail in the *Soils Resource Report*. They are also summarized in the *Soils* section of Chapter 3 of the EIS. The percent area of high and very high MMI (Mass Movement Index) for the project area is shown in the *Soils* section of the EIS (Figure 3-4). However, the effects of mass wasting and erosion are governed by the watershed distribution patterns. Thus, specific analyses were performed at a watershed or site-level (see Section 2.3.1 below).

At the landscape level, hydrology and vegetation were examined by preparing and reviewing maps of the project area showing watershed boundaries, streams by class, roads, vegetation (including second growth), riparian management areas, land ownership and topographic relief (these maps are in the planning record). Maps of stream channel types were also prepared and examined, both at a small scale covering the entire project area and at a large scale covering each potential harvest unit. Hydrology, water quality, and consumptive uses were all addressed at the landscape level in the *Fisheries and Watershed Resource Report* and summarized in the *Water, Fish, and Fisheries* sections of Chapters 3 and 4 of the DEIS.

The species and habitat component of watershed analysis, including components pertaining to the presence of sensitive, threatened, or endangered aquatic and riparian species; management indicator species and their habitat capabilities, the lengths of Class I and II streams, the distribution and abundance of anadromous fish, and other aspects, are described at the landscape level in the *Fisheries and Watershed Resource Report* and the *Water, Fish and Fisheries* and *Threatened, Endangered, and Sensitive Species* sections of Chapters 3 and 4 of the DEIS. Additionally, habitat capability models were run for each VCU in the project area for coho and

pink salmon and Dolly Varden trout (Tables 3-7, 3-8, 3-9 of the *Fisheries and Watershed Resource Report*).

Human uses of the Control Lake project area are documented at a landscape scale in a number of locations. Subsistence uses are described in the *Subsistence Resources Inventory Report* and in the *Subsistence* sections of the EIS. Analyses conducted for the region include: per capita subsistence harvest of deer, black bear, marten, fish, and other resources; total deer, bear, and marten harvest; habitat capability estimates for deer, black bear, and marten; and population and employment statistics for the communities in and near the project area, and other factors. Commercial and non-commercial timber uses are discussed in the *Timber and Vegetation Resources Report* and in the *Vegetation and Timber Resources* sections of the DEIS. Sport fishing and other forms of recreation are discussed in the *Recreation, Wild and Scenic Rivers, Wilderness Areas, and Lands Resource Report*, and the corresponding sections of the DEIS. Commercial fishing is addressed in the *Social and Economic* sections of the DEIS. Mining is discussed in the *Geology Resources Report* and in the *Geology, Minerals, and Karst* sections of the DEIS. The types of analyses conducted included literature review and database research (see section 3.3.5 of the *Geology Resource Report*). Hydropower is not discussed as a topic in itself; however, the only proposed hydropower project in the area is briefly described in the *Fisheries and Watershed Resource Report.*

Few major natural disturbances (e.g., fire and insect/disease infestations) occur in the project area. The most common disturbances are windthrow, insect and disease problems, and mass wasting. Mass wasting is discussed in the *Soils Resource Report* and the *Soils* section of the DEIS. Windthrow and insect and disease problems are discussed at the landscape level in the *Timber and Vegetation Resource Report* and the corresponding sections of the DEIS.

2.2 Watershed-level Analyses

2.2.1 Mass Slope Movement/Erosion

The *Soils Resource Report* contains nearly all of the basic watershed-level analyses associated with mass slope movement and erosion. The percent of high and very high MMI area by watershed can be found in Table 3-3 of the *Soils Resource Report*. The amount of potential harvest on low, moderate, and high MMI soils for each watershed is shown in Table 4-4. Areas of high wind disturbance were not identified on a watershed scale, but were identified for individual stands. The percent of each watershed to be covered by roads was estimated, based on typical road widths. This estimate included existing as well as proposed roads, making it an estimate of the cumulative effects of road building. The number of stream crossings by watershed was presented in *Fisheries and Watershed Resource Report* (Table 4-2). In addition, the *Soils Resource Report* estimated the relative contribution of roads to stream sedimentation based on road usage. Road usage was defined based on the number of harvest units to which a road segment is connected. High risk stream crossings were on roads that lead to many harvest units, while a road segment that leads to one or two harvest units would have a low risk of sedimentation at stream crossings. Further explanation of this analysis can be found in sections 2.3 and 4.1 of the *Soils Resource Report*.

Other analyses were conducted that go beyond the typical watershed analysis procedures. These include: an estimate of the percent of soil disturbance for the entire initial unit pool based on

existing and proposed roads, landings, and quarries(Table 4-2, *Soils Resource Report*); an estimate of the acres of disturbance in units for the units in each alternative based on studies that have related disturbance to logging system (Table 4-2 in the *Soils* section of Chapter 4 of the DEIS); and the relative sedimentation risk from timber harvest units (Table 4-11, *Water, Fish, and Fisheries* section, DEIS).

2.2.2 Hydrology

Sediment transport potential and precipitation were examined on a watershed level. Sediment delivery potential was examined considering the sediment generation potential of harvest units and roads, which was accomplished using relative rankings of harvest units and streams, in a way similar to that proposed by Paustian (1991). Road sediment contribution was estimated by first estimating the amount of traffic on each road segment and taking into account the number of stream crossings (see section 2.3.1 above). Sediment contributions from both roads and harvest units were estimated by watershed.

Precipitation was assessed by examining the records at Craig and Hollis (Table 3-1, *Fisheries and Watershed Resource Report*). In addition, the runoff was examined using the limited data available at Black Bear Lake and Staney Creek. Through existing literature and data, the general sensitivity of runoff response for watersheds in the project area was estimated. This discussion can be found in the *Water, Fish, and Fisheries* section of the DEIS.

Wetlands, one of the basic components of groundwater dynamics, were addressed by estimating the amount of forested wetlands to be harvested, by alternative and for each watershed (Table 4-5, *Wetlands, Floodplains, and Riparian Areas*, DEIS). Similarly, floodplain acres were estimated by watershed in Table 3-3, of the *Wetlands, Floodplains, and Riparian Areas* section of the DEIS. The number of road crossings of Class I floodplains was computed and presented by alternative in Table 4-7 of the *Wetlands, Floodplains, and Riparian Areas* section of the DEIS. Similar tables and discussions are presented in the *Fisheries and Watershed Resource Report.*

An additional analysis that is relevant to hydrology is karst analysis. Watershed-level karst analysis included analyzing geologic maps and aerial photographs to determine the likelihood of karst occurrence. These efforts and their results are described in the *Geology Resource Report.* Areas of high karst probability were investigated in the field (see section 2.3.2, below).

2.2.3 Vegetation

Most of the basic components of the watershed-level analysis of second growth were conducted. The riparian management areas (RMAís) are listed by watershed in Table 3-4a of *the Fisheries and Watershed Resource Report* and the total amount of previously harvested areas (second growth) is shown for the project area in the *Timber and Vegetation Resource Report.* The previously harvested RMAís, by watershed, are shown in Table 3-4b of the *Fisheries and Watershed Resource Report.* In addition, as part of the cumulative effects analysis, the area harvested within the last 15 years by watershed, is shown in Table 4-13 of the *Fisheries and Water Resources Report.* To establish sensitivity to streambank stability, the total area of RMA along high gradient streams harvested within the last 15 years was also tabulated (Table 4-14).

Corresponding tables and discussions are presented in the *Wetlands, Floodplains, and Riparian Areas* sections of Chapters 3 and 4 of the DEIS.

The wetlands analyses conducted are described above in section 2.2.2.

2.2.4 Stream Channel

The watershed-level needs for stream channel analysis are identical to the landscape-level needs. Although the sediment transport potential was not assigned based on channel type, sediment delivery potential was assessed (see section 2.2.1 above). The optional component of identifying areas of karst was also conducted, and the results are contained in the *Geology Resources Report*, and in the *Geology* sections of Chapters 3 and 4 of the DEIS.

2.2.5 Water Quality

Components for watershed-level analyses are nearly identical to those for landscape-level analysis. These efforts were discussed in section 2.1 above.

2.2.6 Species and Habitat

The basic components of watershed-level information are similar to the landscape-level analysis, with a few additional components. The total miles of each stream class, by watershed, are presented in Table 3-5 of the *Fisheries and Water Resources Report*. A discussion of the fisheries resources of each of the major watersheds is also presented in this report. In addition, this report lists the existing and proposed fish enhancement projects in the project area (see Table 3-6).

2.2.7 Human Uses

The watershed-level components for Human Uses assessment are similar to those for landscape-level analyses, with the additional topics of domestic water supplies, and existing roads. Subsistence, recreation/tourism, and timber are discussed at the landscape level in the EIS and in the resource reports. Much of the information obtained on human uses was obtained through the scoping and public involvement process.

Consumptive uses of water (including domestic water supplies) are discussed section 3.2.2.4 of the Fisheries and Water Resources Report. It was determined that no designated municipal watersheds are located in the project area, and there are no established domestic water supplies.

Existing roads are discussed in the *Soils Resource Report* and in the *Fisheries and Watershed Resource Report*. The total acreage of existing roads was calculated using GIS; in addition, existing roads were tabulated by watershed as part of the cumulative effects analysis on sediment delivery, floodplains, and RMA's.

2.2.8 Natural Disturbance

No watershed-level analyses of natural disturbance were performed because of the site-specific nature of natural disturbances in the project area.

2.3 Site-level Analyses

2.3.1 Mass Slope Movement/Erosion

Site-specific analyses are presented on the unit cards, which contain prescriptions for each timber harvest unit. Each timber harvest unit was visited in the field by specialists in each of the fields of concern. Landslides and landslide-prone areas were delineated in the field and were either eliminated from the harvest unit, or special prescriptions (such as 50% selective harvest) were made on the unit cards. Roads were placed to avoid sensitive slopes and to minimize stream crossings. Maps of the roads, with stream crossings were produced along with maps of each timber harvest unit, showing stream crossings and MMI 4 soils.

2.3.2 Hydrology

Topographic maps and aerial photos of each timber harvest unit were reviewed and each one was visited on the ground by resource specialists concerned with the watershed effects of harvest and road building activities. This concern lead to site-specific prescriptions intended to mitigate potential problems. Also, each harvest unit identified as potentially containing karst was examined in the field. Karst features were documented and specific prescriptions were made to avoid damaging the resource.

2.3.3 Vegetation

Within each timber harvest unit, RMA's were delineated, including many that did not exist within the GIS database. Prescriptions were developed that followed appropriate buffer rules for each RMA based on the 1991 TLMP Draft Revision. Buffer widths were often expanded along Class I and II streams and buffers were often prescribed along Class III streams to protect site-specific conditions such as steep v-notches. In some cases, partial cut or no buffers were prescribed. Overall, buffer prescriptions included in unit cards were designed to meet on-site and downstream water quality objectives.

2.3.4 Stream Channel

Stream channel types and process groups were field-verified for those streams that traversed potential harvest units. These characteristics were evaluated for all streams within each timber harvest unit and appropriate buffers and prescriptions were prescribed.

2.3.5 Water Quality

No quantitative water quality parameter measurements were made, but water quality was addressed in the *Fisheries and Watershed Resource Report.*

2.3.6 Species and Habitat

Site-specific surveys were conducted to verify stream classes within and adjacent to timber harvest units. Unmapped streams were also classified. This information is shown on the unit cards. Interviews with local biologists were conducted to obtain information on specific stock sensitivities and susceptibility to the effects of timber harvest. In addition, fish barrier removal opportunities were identified on specific stream reaches near timber harvest units.

2.3.7 Human Uses

Site-level analyses of human uses were based on observations during field studies, interviews with subsistence users, the public involvement and scoping process, meetings with resource agencies, and local knowledge.

2.3.8 Natural Disturbance

Each harvest unit was reviewed on the ground by resource personnel and engineers and natural disturbance factors including windthrow, landslides, insects/diseases were described in the unit cards and were each considered in the preparation of integrated silvicultural prescriptions.

3.0 OVERVIEW OF RESULTS FOR WATERSHEDS OF CONCERN

The purpose of the second part of this appendix is to summarize the major watershed characteristics and sensitivities that were assessed in the EIS and associated resource reports. The following sections are organized by watershed; only the watersheds that have significant harvest (>200 acres) under Alternative 12 (the revised unit pool representing the maximum harvest alternative) are discussed.

3.1 Logjam Creek Watershed (C21C)

Logjam Creek watershed is a fourth order watershed located in the northwest corner of the project area. It is 54,969 acres in size with 15,353 acres in the project area and contains many small lakes in the project area. It drains into Sweetwater Lake to the north and provides habitat for sockeye, coho, pink, and chum salmon, steelhead and resident rainbow trout, cutthroat trout, and Dolly Varden char. The creek has intensive sport fishing partly because of road accessibility. Within the project area, this watershed includes 1,279 acres of area harvested during the past 15 years (1983-1997) or approximately 8 percent. Assuming a 75-ft. road width, approximately 1 percent of this area is covered by existing roads. Under Alternative 12, approximately 210 acres or 1 percent of the watershed in the project area would be harvested and approximately 8 miles of new roads would cover less than 0.5 percent of the area. Alternative 12 would result in an estimated 8 crossings of Class I and II streams and 3 crossings of Class III and IV streams. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would remain the same, after implementation of Alternative 12, at 5 percent.

3.2 Goose Creek Watershed (C49B.10)

Goose Creek is a fifth order watershed located in the southeastern corner of the project area. It is 13,726 acres in size with 12,542 acres inside the project area. Goose Creek flows into the Thorne River near Thorne Bay. Sockeye, coho, and pink salmon are all found in the system, along with cutthroat and steelhead/rainbow trout, and Dolly Varden char. A number of lakes occur within the watershed including Angel Lake, Foot Lake, and Rush Lake. Much of the watershed has previously been harvested, but only 12 percent (1,517 acres) of the project area was harvested during the past 15 years (1983-1997). Assuming a 75-ft. road width, approximately 2 percent of the watershed is covered by existing roads. Approximately 641 acres

or 7 percent of the watershed in the project area would be harvested under Alternative 12 and approximately 10 miles of new roads would cover approximately 1 percent of the watershed. Alternative 12 would result in an estimated 6 crossings of Class I and II streams and 3 crossings of Class III and IV streams. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would increase by 1 percent to 15 percent, after implementation of Alternative 12.

3.3 Control Lake Creek Watershed (C49B.20)

The Control Lake Creek Watershed is 21,429 acres in size and is entirely within the project area. It is a fifth order watershed and includes Control Lake Creek and two forks. The north fork, known as Cutthroat Creek, includes Cutthroat Lake and Upper Cutthroat Lake. The south fork includes Control Lake, Balls Lake, and Control Lake Creek. Control Lake Creek flows directly into the Thorne River from the west side. The watershed is inhabited by sockeye, coho, and pink salmon, steelhead/rainbow trout, cutthroat trout, and Dolly Varden char. Approximately 3 percent of the watershed has been logged during the past 15 years (1983-1997) and the watershed contains about 24 miles of existing roads or about 1 percent of the watershed area (assuming a 75-ft. road width). Under Alternative 12, approximately 270 acres or 1 percent of the watershed would be logged. Additionally, about 3 miles of new roads would be built which would cover about 0.1 percent of the watershed. Alternative 12 would result in an estimated 8 crossings of Class I and II streams and 1 crossing of a Class III or IV stream. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would increase by 2 percent to 5 percent, after implementation of Alternative 12.

3.4 Rio Beaver Watershed (C49B.21)

Rio Beaver is a fourth order watershed that flows directly into the Thorne River. It is bordered by the Goose Creek drainage on the east and the Rio Roberts drainage on the west. It is 8,979 acres in size with essentially all of it occurring in the project area. The stream supports large populations of coho and pink salmon, cutthroat trout, and Dolly Varden char. Much of the watershed was logged in the 1960s, but only approximately 5 percent (413 acres) was harvested during the past 15 years (1983-1997). Assuming a 75-ft. road width, almost 3 percent of the watershed is covered by existing roads. There are many active landslides that have been aerially seeded to assist in stabilization. Approximately 641 acres or 7 percent of the watershed in the project area would be harvested under Alternative 12 and approximately 10 miles of new roads would cover approximately 1 percent of the watershed. Alternative 12 would result in an estimated 3 crossings of Class I and II streams and 19 crossings of Class III or IV streams. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would increase by 5 percent to 12 percent, after implementation of Alternative 12.

3.5 Upper Thorne River Watershed (C49B.23)

The Upper Thorne River Watershed is approximately 16,800 acres in size and is virtually all within the project area. It is a fourth order watershed and makes up the northern portion of the Thorne River watershed. It includes three lakes along the mainstream Thorne River including Twin Lake, Upper Thorne Lake, and Lower Thorne Lake. Sockeye, coho, pink, and chum salmon, steelhead/rainbow trout, cutthroat trout, and Dolly Varden char are all known to inhabit

the stream-lake system; however, pink and chum salmon are unable to pass the falls located 2 miles downstream of Lower Thorne Lake. Approximately 2 percent of the watershed has been logged during the past 15 years (1983-1997) and the watershed contains about 8 miles of existing roads or less than 0.5 percent of the watershed area (assuming a 75-ft. road width). Under Alternative 12, approximately 539 acres or 3 percent of the watershed would be logged. Additionally, about 8 miles of new roads would be built which would cover less than 0.5 percent of the watershed. Alternative 12 would result in an estimated 8 crossings of Class I and II streams and 19 crossings of Class III and IV streams. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would increase by 5 percent to 6 percent, after implementation of Alternative 12.

3.6 Steelhead Creek Watershed (C95B)

Steelhead Creek is a 20,670-acre watershed located in the south-central portion of the project area; 20,133 acres are located in the project area. It enters the Big Salt Lake on the northern side after passing through Sealaska commercial forest land. Approximately 12 percent of the watershed is owned by Sealaska near the mouth of the creek. These private lands in the lower watershed have been heavily harvested including much of the riparian area. Pink, chum, and coho salmon, as well as steelhead/rainbow trout, cutthroat trout, and Dolly Varden char are found in this drainage and there is good rearing and spawning habitat throughout the watershed. A total of approximately 14 percent of the watershed has been harvested with about 13 percent (2,523 acres) harvested during the past 15 years (1983-1997). Assuming a 75-ft. road width, approximately 1.5 percent of the watershed is covered by existing roads. Approximately 745 acres or 4 percent of the watershed in the project area would be harvested under Alternative 12 and approximately 16 miles of new roads would cover less than 1 percent of the watershed. Alternative 12 would result in an estimated 16 crossings of Class I and II streams and 57 crossings of Class III and IV streams. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would increase by 3 percent to 12 percent, after implementation of Alternative 12.

3.7 Shinaku Creek Watershed (D03B)

Shinaku Watershed is the largest watershed on Shinaku Inlet at 16,590 acres, nearly all of which is in the project area. It is a fifth order watershed located in the west-central portion of the project area and has a large estuarine zone at the mouth. The mouth and about 20 percent of the watershed is owned by Sealaska. A large portion of these private lands were harvested during the 1980s, including much of the riparian area. The drainage supports pink, chum, and coho salmon, steelhead/rainbow trout, cutthroat trout, and Dolly Varden char. Additionally, Shinaku Lake, in the upper watershed, supports a planted population of arctic grayling. Only about 3 percent of the watershed as a whole has been harvested (all during the past 15 years) and the watershed contains about 4 miles of existing roads, which cover less than 0.5 percent of the watershed area. Approximately 684 acres or 4 percent of the watershed would be harvested under Alternative 12 and approximately 8 miles of new roads would cover less than 0.5 percent of the watershed. Alternative 12 would result in an estimated 12 crossings of Class I and II streams and 42 crossings of Class III and IV streams. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would increase from almost 0 percent to 8 percent, after implementation of Alternative 12.

3.8 Unnamed Watershed (DO8A)

Watershed D08A is the western-most watershed on Shinaku Inlet and is located between Shinaku Watershed on the east and Elevenmile Watershed on the west. It is a fourth order watershed and is approximately 8,400 acres in size; essentially all of the watershed is in the project area. Only a small area at its mouth is on Sealaska lands. The large, shallow mud flats at the mouth support a large clam population. Coho, pink, and chum salmon have been observed in the stream, which appears to have good rearing but not much spawning habitat. There has been virtually no harvest (except for 9 acres) in this watershed and there are no roads. Approximately 517 acres or 6 percent of the watershed would be harvested under Alternative 12 and approximately 14 miles of new roads would cover approximately 1.5 percent of the watershed. Alternative 12 would result in an estimated 14 crossings of Class I and II streams and 19 crossings of Class III and IV streams. The percentage of the riparian management area along high-gradient, contained channel-type streams harvested within the past 20 years would increase from 0 percent to 4 percent, after implementation of Alternative 12.

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